

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SHABTAI SCOTT SHATSKY, *et al.*,

Plaintiffs,

v.

THE PALESTINE LIBERATION
ORGANIZATION and THE PALESTINIAN
AUTHORITY,

Defendants.

Case No. 18-cv-12355 (MKV) (DCF)

**DECLARATION OF OLIVER S. HAKER IN SUPPORT OF
PLAINTIFFS' OPPOSITION TO DEFENDANTS'
MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION**

OLIVER S. HAKER, pursuant to 28 U.S.C. § 1746, declares as follows:

1. I am an attorney admitted to practice before the courts of the State of New York and before this Court, and I am a Counsel at Cohen & Gresser LLP, attorneys for Plaintiffs in this action. I submit this declaration in opposition to the motion by defendants The Palestine Liberation Organization (the “PLO”) and The Palestinian Authority (the “PA” and, together with the PLO, “Defendants”) to dismiss this action, under Rule 12(b)(2) of the Federal Rules of Civil Procedure, for lack of personal jurisdiction (the “Motion”). The purpose of this declaration is to place before the Court documents and information relevant to the issue of the PLO’s and the PA’s consent to the exercise of personal jurisdiction in this action under the Promoting Security and Justice for Victims of Terrorism Act (“PSJVTAA”), Pub. L. No. 116-94, § 903 (codified at 18 U.S.C. § 2334(e)).

2. Attached as Exhibit 1 is a true and correct copy of excerpts of the transcript of the deposition of Riyad Mansour, conducted on July 8, 2021 in connection with jurisdictional discovery in this action.

3. Attached as Exhibit 2 is a true and correct copy of excerpts of the transcript of the deposition of Nadia Ghannam, conducted on July 23, 2021 in connection with jurisdictional discovery in this action.

A. Consent Under Subparagraph (e)(1)(A) of the PSJVTA

4. Subparagraph (e)(1)(A) of the PSJVTA provides that Defendant The Palestinian Authority (“PA”) or Defendant The Palestinian Liberation Organization (“PLO”) “shall be deemed to have consented to personal jurisdiction” in Anti-Terrorism Act (“ATA”) cases if, after April 18, 2020, they “make[] any payment, directly or indirectly—”

- (i) to any payee designated by any individual who, after being fairly tried or pleading guilty, has been imprisoned for committing any act of terrorism that injured or killed a national of the United States, if such payment is made by reason of such imprisonment; or
- (ii) to any family member of any individual, following such individual’s death while committing an act of terrorism that injured or killed a national of the United States, if such payment is made by reason of the death of such individual.

18 U.S.C. § 2334(e)(1)(A).

5. Below, I summarize testimony by Defendants, and records produced by Defendants, in this litigation concerning payments made to designees and/or family members of individuals who were imprisoned for committing acts of terrorism after being tried or pleading guilty, or who died while committing acts of terrorism, that injured or killed a U.S. national, and payments made to such individuals by reason of their imprisonment or death.

6. Where appropriate, I refer to (a) summaries of information contained in the Declaration of Arieh Dan Spitzen dated October 2, 2021 (“Spitzen Decl.”) and the Declaration of Nick Kaufman dated September 30, 2021 (“Kaufman Decl.”), which Plaintiffs also filed in opposition to the Motion; and (b) public-source information concerning the acts of terrorism described herein.

7. Attached hereto as Exhibit 255 is a true copy of a stipulation between the parties to this action, dated August 3, 2021, that documents produced by Defendants in connection with jurisdictional discovery in this action, bearing the following production numbers, are records of a regularly-conducted activity of the PLO or the PA for purposes of Rule 803(6) of the Federal Rules of Evidence: Shatsky-JD00001-00010, Shatsky-JD00012-00534, and Shatsky-JD00559-02025.

Defendants' Payments to Family Members of Individuals Killed While Committing Acts of Terrorism that Injured or Killed U.S. Nationals by Reason of the Deaths of Such Individuals.

8. Attached as Exhibit 3 is a true and correct copy of excerpts of the transcript of the deposition of Farid Ahmed Abed Hafez Ghannam, conducted on July 29 and 30, 2021 in connection with jurisdictional discovery in this action. Mr. Ghannam was designated by Defendants as a Fed. R. Civ. P. 30(b)(6) witness. *See* Ex. 3 at 15:7-10, 26:5-16.

9. Mr. Ghannam is employed by the PA as Deputy Minister of Finance, and reports to the Minister of Finance, Shukri Bishara. *Id.* at 8:6-8, 15:11-14, 19:7-14. During the course of his 25-year employment with the PA, Mr. Ghannam has also held the positions of Deputy of the Minister of Finance for the past four years, and previously served as general director of the Palestinian budget within the Ministry of Finance, deputy of the general director of the Palestinian budget, and accountant. *See id.* at 19:19-21:11.

10. The Martyrs and Wounded Affairs Establishment (the “Establishment”) is an establishment of the PA “that present [sic] support for the families of wounded and martyrs” according to the 2016 law “that governs the … martyrs’ families and wounded.” *See id.* at 48:15-49:10, 53:2-17, 59:7-60:14.

11. The Establishment is an entity within the PA with a budget funded “from the taxes collected, directly and indirectly, from the Palestinian population.” *See id.* 60:15-25. It is headed

by PA Minister Intissar al-Wazir, who was also previously the head of the establishment of the martyrs and wounded under the PLO. *See id.* at 49:11-52:25.

12. All payments made by Defendants to qualifying designees, or “beneficiaries,” of people designated as martyrs are made from funds under the control of the PA. *Id.* at 146:14-22. All payments made to the families of martyrs and the wounded “go[] through the Ministry of Finance.” *See id.* at 28:21-24.

13. As discussed further herein, Defendants produced in jurisdictional discovery in this action records of Defendants’ payments to “martyrs” (“Martyr Payment Records”). The Establishment generates and prepares Martyr Payment Records to represent and document the “financial support for the family of the martyr.” *Id.* at 44:19-45:7, 47:10-48:23, 61:21-25.

14. As discussed further herein, Defendants produced in jurisdictional discovery in this action reports by the Establishment, prepared by Establishment investigators (“Social Investigation Reports”), that “explain[] that a person died and was considered as a martyr, according to the law, and . . . document[] the location and the date of the incident.” *Id.* at 90:10-13.

15. As detailed below, Defendants’ deposition testimony and documents produced by Defendants in jurisdictional discovery in this action establish that, since April 18, 2021, Defendants have made at least 581 payments, totaling at least 889,020 Israeli shekels, to family members of at least 49 individuals who died while committing acts of terrorism that injured or killed United States nationals, by reason of the deaths of those individuals.

16. ***Sadeq Abdel Hafez.*** “On February 16, 2002, a suicide bomber attacked a pizzeria in Karnei Shomron, a town in the West Bank. The bombing killed United States citizens Keren Shatsky and Rachel Thaler and wounded United States citizens Steven Braun, Chana Friedman,

Leor Thaler, and Hillel Trattner.” *Shatsky v. Palestine Liberation Org.*, 955 F.3d 1016, 1022 (D.C. Cir. 2020). *See also* Ex. 4 (*Patterns of Global Terrorism Report*, U.S. Dep’t of State, Bureau of Counterterrorism and Countering Violent Extremism (2002) at 1 (“On 16 February, a suicide bomber detonated a device at a pizzeria in Karnei Shomron in the West Bank, killing four persons and wounding 27 others. Two US citizens—Keren Shatsky, and Rachel Donna Thaler—were among the dead”)).

17. “Sadeq Abdel Hafez” died perpetrating the attack. *See* Spitzen Decl. ¶ 61. *See also* Ex. 44 (*Suicide Terrorists in the Current Conflict*, ISRAELI SECURITY AGENCY) at 14 (“Zadek Abd al-Hafat,” a member of the Popular Front for the Liberation of Palestine, perpetrated the attack) (a copy of the relevant sections of the translated report is attached as Exhibit 44).¹

18. Rachel Thaler, a U.S. citizen, was killed in the February 16, 2002 attack. *See* Ex. 4 at 1; Exhibit 5 (copy of relevant pages of Rachel Thaler’s U.S. passport, date of issue July 11, 2001).

19. Keren Shatsky, a U.S. citizen, was killed in the February 16, 2002 attack. *See* Ex. 4 at 1; Exhibit 6 (excerpts of transcript of deposition of Shabtai Scott Shatsky dated January 28, 2013) at 18-19 (testifying that he and his wife are American citizens, and their children, including Keren Shatsky, are dual American-Israeli citizens); Exhibit 7 (copy of Keren Shatsky

¹ In some instances, English transliterations of the Arabic names of certain individuals identified in this declaration may differ slightly from the transliterations of those names in documents attached to this declaration, including certified translations of documents produced by Defendants in connection with jurisdictional discovery in this action. Where such discrepancies exist, the names listed in this declaration and in the accompanying documents are believed to refer to the same individual.

Certification of Birth Abroad of a Citizen of the U.S., dated November 12, 1987); Exhibit 8 (copy of relevant pages of Keren Shatsky's U.S. passport).

20. Hillel Trattner, a U.S. citizen, was injured in the February 16, 2002 attack. *See* Exhibit 9 (copy of relevant pages of Hillel Trattner's U.S. passport, date of issue July 11, 1997); Ex. 10 (excerpts of February 12, 2013 deposition transcript of Hillel Trattner) at 9, 21, 25-29 (testifying that he is a citizen of the "United States and Israel" and was injured in the February 16, 2002 terrorist attack).

21. Leor Thaler, a U.S. citizen, was injured in the February 16, 2002 attack. *See* Exhibit 11 (excerpts of February 6, 2013 deposition transcript of Leor Thaler) at 13, 80-85 (testifying that he is a citizen of the United States, England and Israel, and describing the February 16, 2002 terrorist attack and his resulting injuries); Exhibit 13 (copy of relevant pages of Leor Thaler's U.S. passport, date of issue May 31, 2002).

22. Chana Friedman, a U.S. citizen, was injured in the February 16, 2002 terrorist attack. *See* Exhibit 14 (excerpts of February 11, 2013 deposition transcript of Chani Edri [Friedman]) at 10, 13, 102-118 (testifying she is a citizen of the United States and Israel, and describing the February 16, 2002 terrorist attack and her resulting injuries); Exhibit 15 (copies of relevant pages of Chana Freedman's U.S. passports, dates of issue February 19, 1998 and July 21, 2003).

23. Steven Braun, a U.S. citizen, was injured in the February 16, 2002 terrorist attack. *See* Exhibit 16 (copy of relevant pages of Steven Braun's U.S. passport, date of issue February 28, 2000); Exhibit 17 (excerpts of February 5, 2013 deposition transcript of Steven Braun) at 38-45 (testifying regarding his injuries from the February 16, 2002 attack).

24. Attached as Exhibit 249 are copies of relevant pages of United States' passports for the following Plaintiffs in this action: Shabtai Scott Shatsky, Jo Anne Shatsky, Tzippora Shatsky Schwarz, Yoseph Shatsky, Sara Shatsky Tzimmerman, Miriam Shatsky, David Raphael Shatsky, Michael Thaler, Zvi Thaler, Isaac Thaler, Aron S. Trattner, Shelley Trattner, Ilan Friedman, Miriam Friedman, Yehiel Friedman, Zvi Friedman, and Bella Friedman. *See also* Ex. 6 at 18-19 (Shabtai Scott Shatsky testifying that he and his wife are American citizens, and their children are dual American-Israeli citizens). Attached as Exhibit 12 is a copy of Plaintiff Efrat Trattner's Certification of Birth Abroad of a Citizen of the U.S., dated April 29, 1985. Attached as Exhibit 253 is a copy of Hadassah Trattner's Illinois Certificate of Live Birth, dated March 14, 1980). Attached here to as Exhibit 254 is a copy of Yael Trattner's Illinois Certificate of Live Birth, dated October 9, 1975.

25. Attached as Exhibit 18 is a true and correct copy of Social Investigation Report documents relating to "Sadeq Ahed Mahmoud Abdel Hafez" ("Hafez") that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00977 to Shatsky-JD00990, together with a certified translation of such records from Arabic into English. *See* Ex. 3 at 74:14-75:23, 77:5-79:18.

26. Defendants testified that the Social Investigation Report "explains that a person died and was considered as a martyr, according to the law, and it documents the location and the date of the incident." *See* Ex. 3 at 90:10-13. Defendants further testified that this document, written by an Establishment worker (Ex. 3 at 107:1-7), reflects that:

- a. The "date" of the incident was February 16, 2002 and the "place" of the incident was "Karnei Shomron Settlement," which is where and when Hafez died. *See* Ex. 3 at 80:12-83:17, 106:21-25; Ex. 18 at Shatsky-JD00978.

- b. February 16, 2002 is the date Hafez died to due to injuries caused by an explosive device, which Hafez detonated, killing himself and other people. *See* Ex. 3 at 107:8-108:25.
- c. The “Details of the incident” section in Hafez’s Social Investigation Report provides that it was a “Martyrdom Operation in Karnei Shomron Settlement.” *See* Ex. 3 at 83:18-84:11; Ex. 18 at Shatsky-JD00978.
- d. The date of Hafez’s “martyrdom” “is February 16, 2002.” *See* Ex. 3 at 95:24-96:4; Ex. 18 at Shatsky-JD00980.

27. Defendants relied on the information contained in the Social Investigation Report to designate Hafez a “martyr.” *See* Ex. 3 at 109:1-14.

28. A signature under “Decision of the establishment’s director” in Hafez’s Social Investigation Report means “it is approved by the general director to consider him as a martyr since the date of martyrdom.” *See* Ex. 3 at 94:16-95:2; Ex. 18 at Shatsky-JD00980.

29. The “Confirmation of the director general” of the Establishment provides that Hafez is “to be confirmed as a martyr of the Al-Aqsa Martyrs” and “be paid 600 shekels a month.” *See* Ex. 3 at 110:1-7; Ex. 18 at Shatsky-JD00980.

30. Hafez’s “beneficiary” is listed as his father “Ahed Mahmoud Abdallah Abdel Hafez” (Identification No. “^{Redacted}3896”). *See* Ex. 18 at Shatsky-JD00978-79.

31. Attached as Exhibit 19 are true and correct copies of Martyr Payment Records as to Hafez that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00113 to Shatsky-JD00117, together with a certified translation of such records from Arabic into English. *See* Ex. 3 at 61:7-25, 65:23-66:5.

32. Hafez's Martyr Payment Records reflect that his "Case Type" is "Martyr," meaning Hafez has been determined to be a "martyr" by Defendants. *See* Ex. 3 at 65:23-66:5; Ex. 19 at Shatsky-JD00113.

33. Hafez's father, "Ahed Mahmoud Abdallah Abd Al-Hafez" (Identification No. ^{“Redacted”}3896") is Hafez's payment designee, "the beneficiary person who's going to receive the payment that is determined by the law for the martyr's family," and Hafez's designee who receives the monthly payments listed on Hafez's Martyr Payment Records. *See* Ex. 3 at 66:6-21, 69:22-70:19; Ex. 19 at Shatsky-JD00113.

34. Hafez's Martyr Payment Records reflect monthly payments made by Defendants to Hafez's designee and father between May 2020 and April 2021, totaling 16,800 shekels. *See* Ex. 3 at 69:22-70:19; Ex. 19 at Shatsky-JD00117.

35. Defendants testified that if Hafez had not been determined to be a "martyr" by the Establishment under the applicable laws, Hafez's father would not be receiving the payments reflected in Hafez's Martyr Payment Records. *See* Ex. 3 at 72:25-73:22.

36. ***Abdel-Muti Mohammad Saleh Shabaneh.*** "On June 11, 2003, a Hamas suicide bomber blew up Egged bus number 14A. One of the deadliest attacks of the year, the explosion killed 17 people, including [U.S. citizen] Alan Beer, and wounded more than 99." *Beer v. Islamic Republic of Iran*, 574 F. Supp. 2d 1, 6 (D.D.C. 2008) (internal citations omitted). This declaration refers to the attack as the "June 11, 2003 Attack."

37. The following U.S. citizens were also injured by the attack: Harry Leonard Beer, Anna Beer, Phyllis Maisel, Estelle Carroll, Nathan Pam, Raziel Pam, and Neemah Pam Fisher. *See id.* at 6, 14; *Miller v. Arab Bank, PLC*, 372 F. Supp. 3d 33, 41 (E.D.N.Y. 2019); Complaint at 3-5, *Pam v. Arab Bank*, No. 18-cv-4670 (PKC) (CLP) (E.D.N.Y. Aug. 17, 2018), ECF No. 1;

Ex. 20 (*Patterns of Global Terrorism Report*, U.S. Dep’t of State, Bureau of Counterterrorism and Countering Violent Extremism (2003) at 1 (“Alan Beer and Bertin Joseph Tita were killed on 11 June in a bus bombing near Klal Center on Jaffa Road near Jerusalem.”)).

38. “Abdel-Muti Mohammad Saleh Shabaneh” died perpetrating the June 11, 2003 Attack. *See* Spiten Decl. ¶ 61.

39. Attached as Exhibit 21 is a true and correct copy of Social Investigation Report documents as to “Abdel-Muti ‘Mohammad Saleh’ Mohammad Shabaneh” (“Shabaneh”) that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00596 to Shatsky-JD00602, together with a certified translation of such records from Arabic into English. *See* Ex. 3 at 113:1-20.

40. Defendants testified that Shabaneh’s Social Investigation Report, written by an Establishment worker (Ex. 3 at 115:13-17), reflects that:

- a. The “details” of the incident provide that it was a “martyrdom operation in the City of Jerusalem” that “caused the death of 17 Israelis and injured nearly 100.” *See* Ex. 3 at 115:18-25; Ex. 21 at Shatsky-JD00597.
- b. The “date” of the incident was June 11, 2003, and the “place” of the incident was Jerusalem Mahne Yehuda Street. *See* Ex. 3 at 115:5-12; Ex. 21 at Shatsky-JD00597.
- c. Shabaneh died in the June 11, 2003 attack due to injuries caused by the detonation of an explosive device that he detonated himself, which killed others and injured nearly 100 people. *See* Ex. 3 at 116:6-118:12.
- d. The June 11, 2003 attack caused Shabaheh to be designated as a martyr. *See id.* at 118:8-12.

e. Shabaneh's mother, "Rahma Mustafa Abd Al-Mun'im Shabaneh," Identification No. ^{“Redacted”} 5126, is Shabaneh's beneficiary. *See* Ex. 3 at 113:24-115:1; Ex. 21 at Shatsky-JD00597.

41. Shabaneh's Social Investigation Report states that both the "Recommendation of the Department" and "Decision of the establishment's director" are that Shabaneh is "[t]o be confirmed as a martyr of the Al-Aqsa Intifada," and the "Confirmation of the director general" states "[w]ill be paid [redacted] shekels a month." *See* Ex. 21 at Shatsky-JD00599.

42. Defendants testified that if Shabaneh had not been designated a martyr, then his mother and designee would not be receiving payments that were confirmed by the "director general" in his Social Investigation Report because of his role perpetrating the June 11, 2003 attack. Ex. 3 at 119:7-11, 121:14-19.

43. Attached as Exhibit 22 are true and correct copies of Martyr Payment Records as to Shabaneh that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00184 to Shatsky-JD00188, together with a certified translation of such records from Arabic into English. *See* Ex. 3 at 110:24-111:21.

44. The "Case Type" in Shabaneh's Martyr Payment Records reflects "Martyr." *See* Ex. 22 at JD00184.

45. Shabeneh's Martyr Payment Records reflect monthly payments made by Defendants to Shabeneh's mother and designee "Rahma Mustafa Abd Al-Mun'im Shabaneh" (Identification No. ^{“Redacted”} 5126") between May 2020 and April 2021, totaling 16,800 shekels. *See* Ex. 3 at 111:14-112:17; Ex. 22 at JD00188.

46. Defendants testified that Shabaneh's Martyr Payment Records reflect that Shabaneh's mother and designee has received a monthly payment of 1,400 shekels from May

2020 through April 1, 2021 as the beneficiary of Shabaneh because Shabaneh has been designated as a “martyr.” *See* Ex. 3 at 112:6-22; Ex. 22 at JD00188.

47. ***Ramiz Fahmi Izz al-Din Abu Salim.*** On September 9, 2003, U.S. citizens David Applebaum and his daughter Naava Applebaum were killed when a suicide terrorist detonated an explosive device next to the Café Hillel in Jerusalem. *See* Ex. 23 (Declaration of Debra Applebaum dated November 3, 2020, filed in *Sokolow v. Palestine Liberation Org.*, No. 04-cv-00397 (GBD) (S.D.N.Y. Nov. 12, 2020) (ECF No. 1018-24)).

48. Suicide terrorist “Ramiz Fahmi Izz al-Din Abu Salim” died perpetrating the attack. *See* Spitzen Decl. ¶ 61.

49. Attached as Exhibit 24 is a true and correct copy of Social Investigation Report documents as to “Ramiz Fahmi Izz al-Din Aslim” (“Salim”) that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00613 to Shatsky-JD00627, together with a certified translation of such records from Arabic into English. *See* Ex. 3 at 124:14-25.

50. Defendants testified that Salim’s Social Investigation Report, written by an Establishment worker (Ex. 3 at 126:5-9), reflects that:

- a. The “date” of the incident was September 9, 2003, and the “place” of the incident was Jerusalem. *See* Ex. 3 at 125:24-126:3; Ex. 24 at Shatsky-JD00614.
- b. The “details” of the incident provide that Salim “used an explosive belt which he wore on his body, to perpetrate a martyrdom attack in a coffee shop of the Zionists in the city of Jerusalem. The attack took place shortly [sic] before midnight (Tuesday), when the coffee shop was filled with Zionists. Seven

Zionists were killed and dozens were wounded as a result.” *See* Ex. 3 at 126:10-127:5; Ex. 24 at Shatsky-JD00614.

- c. The Establishment relied on these “details” when it designated Salim a martyr, and the martyrdom operation was the September 9, 2003 attack. *See* Ex. 3 at 127:9-128:4.
- d. Salim’s mother, “Ghalia Zaki Abd Al-Hamid Abu Salim,” has been receiving monthly payments and is Salim’s beneficiary. *See* Ex. 3 at 125:2-23; Ex. 24 at Shatsky-JD00614.

51. Salim’s Social Investigation Report states that the “Recommendation of the Department” is “we recommend that you confirm his status as a martyr of the Al-Aqsa Intifada in accordance with the regulations,” and the “Confirmation of the director general” provides “[c]onfirmed as a martyr of the Al-Aqsa Intifada,” and “[w]ill be paid 600 shekels a month.” *See* Ex. 3 at 127:15-128:14; Ex. 24 at Shatsky-JD00616.

52. Attached as Exhibit 25 are true and correct copies of Martyr Payment Records as to Salim that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00194 to Shatsky-JD00198, together with a certified translation of such records from Arabic into English. *See* Ex. 3 at 122:9-123:6.

53. The “Case Type” in Salim’s Martyr Payment Records reflects “Martyr.” *See* Ex. 25 at Shatsky-JD00194.

54. Salim’s Martyr Payment Records reflect monthly payments made by Defendants to Salim’s mother and designee (“Ghalia Zaki Abd Al-Hamid Abu Salim”) between May 2020 and April 2021, totaling 16,800 shekels. *See* Ex. 3 at 123:7-124:1; Ex. 25 at Shatsky-JD00198.

55. Defendants testified that Salim's mother and designee is receiving these payments because the Establishment designated Salim as a martyr. *See* Ex. 3 at 124:2-6.

56. ***Abdel Rahman Idris al-Shaludi.*** "On the afternoon of October 22, 2014, [a suicide terrorist] . . . drove a car to a light rail station in Jerusalem and intentionally drove onto the light rail tracks and rammed his vehicle into the crowd of pedestrians. *Braun v. Islamic Republic of Iran*, 228 F. Supp. 3d 64, 72 (D.D.C. 2017) (internal quotation omitted). The following U.S. citizens were either killed or injured by the attack: Chaya Zissel Braun, Shmuel Braun, Chana Braun, Esther Braun, Murray Braun. *See id.* at 72-73.

57. "Abdel Rahman Idris al-Shaludi" died perpetrating the attack. *See* Spitzen Decl. ¶ 61.

58. Attached as Exhibit 26 is a true and correct copy of Social Investigation Report documents as to "Abdel Rahman Idris Muhammad al-Shaludi" ("Shaludi") that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00689 to Shatsky-JD00698, together with a certified translation of such records from Arabic into English. *See* Ex. 3 at 132:12-22.

59. Defendants testified that Shaludi's Social Investigation Report, written by an Establishment worker (Ex. 3 at 135:1-7), reflects that:

- a. The "date" of the incident was October 22, 2014, and the "place" of the incident was French Hill. Ex. 3 at 134:8-10; Ex. 26 at 690. Shaludi's date of martyrdom is the date of the October 22, 2014 attack. *See* Ex. 3 at 138:3-9; Ex. 26 at Shatsky-JD00692.
- b. The "details" of the incident are that Shaludi "became a martyr – may Allah have mercy upon him – when he executed a vehicular attack against a group of settlers

in the city of Jerusalem / French Hill. The attack claimed the lives of two settlers, and injured 6 others. As a result, one of the settlers opened fire immediately after he got out of his car, and so he was martyred on the spot.” *See* Ex. 3 at 134:11-25; Ex. 26 at Shatsky-JD00690.

- c. The Establishment relied on these “details” when it determined Shaludi is a martyr, and “according to the law,” the October 22, 2014 attack is the incident that made Shaludi a martyr for purposes of the Establishment. *See* Ex. 3 at 136:25-138:17.
- d. Shaludi’s father, “Idris Muhammad Yahya Abd al-Majid al-Shaludi,” who has been receiving monthly payments, is Shaludi’s beneficiary. *See* Ex. 3 at 135:14-136:7; Ex. 26 at Shatsky-JD00691.

60. Shaludi’s Social Investigation Report states that the “Decision of the establishment’s director” is “I recommend that the case will be confirmed as a martyr of al-Aqsa Martyrs as of the date of his martyrdom, and the President’s honorary payment will be added to his first allowance. The beneficiary for the martyr is his father, Idris Muhammad Yahya Abd al-Majid al-Shaludi . . .” *See* Ex. 3 at 137:17-138:2; Ex. 26 at Shatsky-JD00692.

61. Shaludi’s Social Investigation Report states that the “Confirmation of the director general” provides that Shaludi “is confirmed as a martyr of the Al-Aqsa Intifada,” and that Shaludi “will receive a martyr payment of 1700 Shekels a month according to the regulations, in addition to a President’s honorary payment of 6000 shekels which will be added to the first allowance.” *See* Ex. 26 at Shatsky-JD00692.

62. Attached as Exhibit 27 are true and correct copies of Martyr Payment Records as to Shaludi that Defendants produced in connection with jurisdictional discovery in this action,

bearing production numbers Shatsky-JD00225 to Shatsky-JD00228, together with a certified translation of such records from Arabic into English. *See* Ex. 3 at 130:2-20.

63. The “Case Type” in Shaludi’s Martyr Payment Records reflects “Martyr,” meaning the Establishment designated Shaludi as a martyr. *See* Ex. 3 at 130:21-131:3; Ex. 27 at Shatsky-JD00225.

64. Shaludi’s Martyr Payment Records reflect monthly payments made by Defendants to Shaludi’s father and designee (“Idris Muhammad Yahya al-Shaludi”) between May 2020 and April 2021, totaling 21,100 shekels. *See* Ex. 3 at 131:4-132:4; Ex. 27 at Shatsky-JD00228.

65. Defendants testified that Shaludi’s father has been receiving these payments from funds under the control of the PA, and further testified that the 6000 shekel “honorary payment” referenced in Shaludi’s Social Investigation Report would not have been made if Shaludi had not been designated a “martyr.” *See* Ex. 3 at 131:21-132:8, 142:5-143:1.

66. ***Izz al-Din Shuheil Ahmad al-Masri.*** “On August 9, 2001, an unremarkable day in Jerusalem was rendered tragically memorable when [a suicide terrorist] detonated a ten-pound bomb at a Sbarro restaurant. The resulting explosion killed 15 people” *Roth v. Islamic Republic of Iran*, 78 F. Supp. 3d 379, 387-88 (D.D.C. 2015) (internal citations omitted). This declaration refers to the attack as the “August 9, 2001 Attack.”

67. The following U.S. citizens were either killed or injured by the attack: Malka Chana Roth, Frimet Roth, Elisheva Roth, Pesia Roth, Rivka Roth Rappaport, Zvi Roth, Shaya Roth, Pinchas Roth, Judith Lilian Greenbaum, Steven Greenbaum, Alan Hayman, and Shirlee Hayman. *See id.* at 389-90; *Greenbaum v. Islamic Republic of Iran*, 451 F. Supp. 2d 90, 95-96, 108 (D.D.C. 2006). *See also* Exhibit 28 (*Patterns of Global Terrorism Report*, U.S. Dep’t of

State, Bureau of Counterterrorism and Countering Violent Extremism (2001) at 3 (“On 9 August in Jerusalem, a suicide bomber walked into a busy downtown restaurant and detonated a 10-pound bomb that he was wearing, killing 15 persons and wounding 130 others. Among the fatalities were US citizens Judith Greenbaum and Malka Roth.”).

68. “Izz al-Din Shuheil Ahmad al-Masri” (“Masri”) died perpetrating the August 9, 2001 Attack. *See* Spitzen Decl. ¶ 61.

69. Attached as Exhibit 29 is a true and correct copy of the Declaration of Arnold Roth dated September 4, 2014, filed in *Roth v. Islamic Republic of Iran*, No. 11-cv-01377 (RCL) (D.D.C. Oct. 2, 2014) (ECF No. 34-2) ¶¶ 2-3 (stating that “[a]t the time of her death at age 15, [Malka Roth] was a United States citizen” and her “life ended in a terrorist massacre on August 9, 2001 when a human bomb dispatched by the terrorist organization Hamas exploded in the Sbarro restaurant.”).

70. Attached as Exhibit 30 is a true and correct copy of Malka Roth’s Certification of Birth Abroad of Citizen of the U.S. filed in *Roth v. Islamic Republic of Iran*, No. 11-cv-01377 (RCL) (D.D.C. Oct. 2, 2014) (ECF No. 34-1).

71. Attached as Exhibit 31 is a true and correct copy of the Declaration of Frimet Roth dated September 4, 2014, filed in *Roth v. Islamic Republic of Iran*, No. 11-cv-01377 (RCL) (D.D.C. Oct. 2, 2014) (ECF No. 34-3) ¶¶ 3, 9-12, 16-18 (stating that “I am a citizen of the United States and Israel,” attaching a copy of her U.S. passport, and describing the injuries and harm caused by the death of her daughter Malka Roth in the terrorist attack).

72. Attached as Exhibit 32 is a true and correct copy of the Declaration of Pesia Roth dated September 30, 2014, filed in *Roth v. Islamic Republic of Iran*, No. 11-cv-01377 (RCL) (D.D.C. Oct. 2, 2014) (ECF No. 34-10) ¶¶ 4, 6, 8, 15-16 (stating that “I am a citizen of the

United States and Israel,” attaching a copy of her U.S. passport, and describing the injuries and harm caused by the death of her sister Malka Roth in the terrorist attack).

73. Attached as Exhibit 33 is a true and correct copy of the Declaration of Rivka Roth Rappaport dated September 4, 2014, filed in *Roth v. Islamic Republic of Iran*, No. 11-cv-01377 (RCL) (D.D.C. Oct. 2, 2014) (ECF No. 34-6) ¶¶ 4, 6-8, 16-17 (stating that “I am a citizen of the United States and Israel,” attaching a copy of her U.S. passport, and describing the injuries and harm caused by the death of her sister Malka Roth in the terrorist attack).

74. Attached as Exhibit 34 is a true and correct copy of the Declaration of Zvi Roth dated September 4, 2014, filed in *Roth v. Islamic Republic of Iran*, No. 11-cv-01377 (RCL) (D.D.C. Oct. 2, 2014) (ECF No. 34-7) ¶¶ 4, 6-8, 15-16 (stating that “I am a citizen of the United States and Israel,” attaching a copy of his U.S. passport, and describing the injuries and harm caused by the death of his sister Malka Roth in the terrorist attack).

75. Attached as Exhibit 35 is a true and correct copy of the Declaration of Shaya Roth dated September 4, 2014 filed in *Roth v. Islamic Republic of Iran*, No. 11-cv-01377 (RCL) (D.D.C. Oct. 2, 2014) (ECF No. 34-8) ¶¶ 4, 6-8, 16-17 (stating that “I am a citizen of the United States and Israel,” attaching a copy of his U.S. passport, and describing the injuries and harm caused by the death of his sister Malka Roth in the terrorist attack).

76. Attached as Exhibit 36 is a true and correct copy of the Declaration of Pinchas Roth dated September 4, 2014 filed in *Roth v. Islamic Republic of Iran*, No. 11-cv-01377 (RCL) (D.D.C. Oct. 2, 2014) (ECF No. 34-9) ¶¶ 4, 6, 10-11 (stating that “I am a citizen of the United States and Israel,” attaching a copy of his U.S. passport, and describing the injuries and harm caused by the death of his sister Malka Roth in the terrorist attack).

77. Attached as Exhibit 37 is a true and correct copy of Social Investigation Report documents as to Masri that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00896 to Shatsky-JD00913, together with a certified translation of such records from Arabic into English. *See* Ex. 3 at 147:5-22.

78. Defendants testified that Masri's Social Investigation Report, written by an Establishment worker (Ex. 3 at 151:24-152:8), reflects that:

- a. The "date" of the incident was August 9, 2001, and the "place" of the incident was West Jerusalem, "Sbarro Restaurant." *See* Ex. 3 at 151:24-152:2; Ex. 37 at Shatsky-JD00904.
- b. The "details" of the incident provide that Masri "[b]ecame a martyr as a result of a martyrdom operation in West Jerusalem on" August 9, 2001, and Masri died due to injuries caused by an explosive device that he detonated himself, which killed other individuals. *See* Ex. 3 at 152:9-153:20; Ex. 37 at Shatsky-JD00904.
- c. The circumstances of Masri's death made him a martyr. *See* Ex. 3 at 153:2-154:24; Ex. 37 at Shatsky-JD00904.

79. Masri's Social Investigation Report states that the "Decision of the establishment's director" is "[t]o be confirmed as a martyr of the Al-Aqsa Intifada," and the "Confirmation of the director general" states "[t]o be confirmed as a martyr ... to be paid" an amount that has been redacted by Defendants. *See* Ex. 3 at 154:25-155:22; Ex. 37 at Shatsky-JD00907-08.

80. Attached as Exhibit 38 are true and correct copies of Martyr Payment Records as to Masri that Defendants produced in connection with jurisdictional discovery in this action,

bearing production numbers Shatsky-JD00083 to Shatsky-JD00087, together with a certified translation of such records from Arabic into English. *See* Ex. 3 at 144:21-145:11.

81. The “Case Type” in Masri’s Martyr Payment Records reflects “Martyr,” meaning the Establishment designated Masri as a “martyr.” *See* Ex. 3 at 145:12-19; Ex. 38 at Shatsky-JD00083.

82. Masri’s Martyr Payment Records reflect payments made by Defendants to Masri’s mother and designee between May 2020 and April 2021, totaling 16,800 shekels. *See* Ex. 3 at 145:20-146:10; Ex. 38 at Shatsky-JD00087.

83. Defendants testified that Masri’s martyr payments were renewed for Masri’s mother and designee on October 20, 2020, as reflected in a document signed by the General Director of Allowances (an employee of the PLO). *See* Ex. 3 at 147:17-149:20; Ex. 37 at Shatsky-JD00896.

84. Defendants testified that if Masri had not been determined to be a “martyr” by the Establishment, his mother and designee would not qualify to receive payments under this program, and that Masri’s mother continued to receive those payments as of the date of Mr. Ghannam’s deposition (July 30, 2021). *See* Ex. 3 at 146:24-147:2, 156:14-23.

85. ***Abd El Karim Yassin Bader and Salah a-Din Hassan Salem Jadallah.*** “On October 9, 1994, as Nachshon [Wachsman] waited on the side of the road for a ride to visit a friend, four members of Hamas . . . abducted [Wachsman] from a public street near Lod, Israel.” *Wachsman ex rel. Wachsman v. Islamic Republic of Iran*, 603 F. Supp. 2d 148, 152-53 (D.D.C. 2009). After a standoff with Israeli security forces, three of the perpetrators were killed, after which the forces “found [Wachsman] dead in a back room with his hands and legs bound.” *Id.* at 153.

86. Nachshon Wachsman, his siblings, and his mother were all U.S. citizens. *See id.* at 154-55. *See also* Exhibit 39 (Plaintiffs' Exhibits filed in *Wachsman ex rel. Wachsman v. Islamic Republic of Iran et al.*, No. 06-cv-00351 (RMU) (D.D.C. Nov. 30, 2007) (ECF No. 14-1) (containing passports and proof of U.S. citizenship for Nachshon Wachsman and his family members Esther Wachsman, Menoshe Wachsman, Yitzchak Wachsman, Uriel Wachsman, Raphael Wachsman, Eliahu Wachsman, and Chaim Wachsman).

87. Nachshon Wachsman's family members were injured by the October 9, 1994 attack. *See Wachsman*, 603 F. Supp. 2d at 157-59 (finding that family members Esther Wachsman, Menoshe Wachsman, Yitzchak Wachsman, Uriel Wachsman, Raphael Wachsman, Eliahu Wachsman, and Chaim Wachsman suffered extreme emotional distress as a result of Nachshon Wachsman's death).

88. According to evidence before the court in *Wachsman*, the following perpetrators were killed as security forces attempted to rescue Wachsman: "Salah a-Din Hassan Salem Jadallah"; Hassan Natshe; and "Abd El Karim Yassin Bader" ("Bader"). *See Wachsman*, 603 F. Supp. 2d at 152-53.

89. Attached as Exhibit 40 is a true and correct copy of Social Investigation Report documents as to Bader that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00775 to Shatsky-JD00778 and Shatsky-JD00783, together with a certified translation of such records from Arabic into English. Bader's Social Investigation Report reflects that:

- a. The date of the incident was October 14, 1994, and Bader "was hiding a soldier after he kidnapped him," and died "[a]s a result of shots fired at him." *See* Ex. 40 at Shatsky-JD00776.

- b. The “Decision of the establishment’s director” is “[t]he case is confirmed by Ramallah and is paid 219 Shekels a month.” *See* Ex. 40 at Shatsky-JD00778.
- c. In 2009, the Establishment transferred the “disbursement” to Bader’s mother, “Ataf Abd El Karim Muhammad Bader, due to the passing of the father of the martyr...” *See* Ex. 40 at Shatsky-JD00783.

90. Attached as Exhibit 41 are true and correct copies of Martyr Payment Records as to Bader that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00017 to Shatsky-JD00021, together with a certified translation of such records from Arabic into English.

91. Bader’s Martyr Payment Records reflect that the “Case Type” is “Martyr,” and that Defendants made monthly payments to Bader’s mother “Ataf Abd al-Karim Muhammad Bader” between May 2020 and February 2021, totaling 17,000 shekels. Ex. 41 at JD00017, JD00021.

92. Attached as Exhibit 42 is a true and correct copy of Social Investigation Report documents as to “Salah A-Din Jadallah Hassan Salem” (“Salah Salem”) that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00763 to Shatsky-JD00767, together with a certified translation of such records from Arabic into English. Salah Salem’s Social Investigation Report reflects that:

- a. Salah Salem “[b]ecame a martyr on 10.14.1994 in Jerusalem ... after his cell [members] and him kidnapped an Israeli soldier in the area of Bir Nabala and then killed him.” *See* Ex. 42 at Shatsky-JD00765.

b. The “Decision of the establishment’s director” is “[t]he Case is a confirmed Social Case,” with the recommendation “to confirm” Saleh Salem “as a martyr.” *See* Ex. 42 at Shatsky-JD00767.

c. Salah Salem’s “beneficiary” is listed as his father “Jadallah Hassan Jadallah Salem” (Identification No. “^{Redacted}7016”). *See* Ex. 42 at Shatsky-JD00765-66.

93. Attached as Exhibit 43 are true and correct copies of Martyr Payment Records as to Salah Salem that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00012 to Shatsky-JD00016, together with a certified translation of such records from Arabic into English.

94. Salah Salem’s Martyr Payment Records reflect that the “Case Type” is “Martyr,” and that Defendants made monthly payments to Salah Salem’s father and beneficiary “Jadallah Hassan Jadallah Salem” (Identification No. “^{Redacted}7016”) between May 2020 and April 2021, totaling 16,800 shekels. *See* Ex. 43 at Shatsky-JD00012, Shatsky-JD00016.

95. ***Abdel-Basit Mohammed Qasem Odeh.*** On March 27, 2002, a Hamas suicide terrorist detonated a bomb at the Park Hotel in Netanya, killing 29 people and injuring 144. *See Suicide Terrorists in the Current Conflict*, ISRAELI SECURITY AGENCY at 12 (a copy of the relevant sections of the translated report is attached as Exhibit 44); Declaration of Itzhak Ilan 1–3, *Shatsky v. Syrian Arab Republic*, No. 08-cv-0496 (RJL) (D.D.C. Sept. 15, 2020), ECF No. 50–1. This declaration refers to the attack as the “March 27, 2002 Attack.”

96. Among those injured by the March 27, 2002 Attack were U.S. citizens Moshe Naimi and Hannah Rogen. Based on their injuries, the above-named victims brought federal actions under 18 U.S.C. § 2333 and other statutes against Arab Bank, PLC. *See* Second Amended Complaint at 19, *Little v. Arab Bank, PLC*, No. 04-cv-5449 (NG) (VVP) (E.D.N.Y.

Apr. 10, 2007), ECF No. 307; Complaint at 67, *Coulter v. Arab Bank, PLC*, No. 05-cv-0365 (E.D.N.Y. Jan. 21, 2005), ECF No. 1. The complaints, signed by attorneys Mark S. Werbner of Sayles Werbner P.C. and Gary M. Osen of Osen & Associate, LLC, state that the above-named victims were U.S. citizens. *See Litle* Second Amended Complaint at 19, 107; *Coulter* Complaint at 67, 109. *See also* Ex. 4 (*Patterns of Global Terrorism Report*, U.S. Dep’t of State, Bureau of Counterterrorism and Countering Violent Extremism (2002) at 1 (“on 27 March, a HAMAS homicide bomber entered the crowded restaurant of a hotel in Netanya, Israel, and detonated a bomb, killing 22 persons, including one US citizen, Hannah Rogen.”)).

97. “Abdel-Basit Mohammed Qasem Odeh” (“Odeh”) died perpetrating the March 27, 2002 attack. *See* Spalten Decl. ¶ 61.

98. Attached as Exhibit 45 is a true and correct copy of Social Investigation Report documents as to Odeh that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD01007 to Shatsky-JD01010, together with a certified translation of such records from Arabic into English. Odeh’s Social Investigation Report reflects that:

- a. On March 27, 2002, Odeh “was martyred as a result of a martyrdom operation in Netanya / inside a hotel.” *See* Ex. 45 at Shatsky-JD01008.
- b. The “Decision of the establishment’s director” is that Odeh is to “[t]o be confirmed as an Al-Aqsa Martyr,” and the “Confirmation of the director general” is that Odeh is “[t]o be confirmed as an Al-Aqsa Martyr” and be “paid [Redacted].” *See* Ex. 45 at Shatsky-JD01010.
- c. Odeh’s “beneficiary” is listed as his father “Mohammed Qasem Sa’id Odeh” (Identification No. “^{Redacted}0818”). *See* Ex. 45 at Shatsky-JD01008.

99. Attached as Exhibit 46 are true and correct copies of Martyr Payment Records as to Odeh that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00123 to Shatsky-JD00127, together with a certified translation of such records from Arabic into English.

100. Odeh's Martyr Payment Records reflect that the "Case Type" is "Martyr," and that Defendants made monthly payments to his father and beneficiary "Muhammad Qasem Sa'id Odeh" (Identification No. "^{Redacted}0818") between May 2020 and April 2021, totaling 16,800 shekels. Ex. 46 at Shatsky-JD00123, Shatsky-JD00127.

101. *Abdul Salaam Sadek Mer'y Hassoun*. "On January 17, 2002, at approximately 10:45 p.m., an agent of the PLO and PA arrived at the banquet hall with an M-16 assault rifle, three clips of bullets, and a hand grenade. The agent shot a security guard at the entrance to the hall, and then entered the hall and opened fire on the crowd. There were approximately 180 people present. Six people were killed and approximately thirty were injured." *Knox v. Palestine Liberation Org.*, 442 F. Supp. 2d 62, 66 (S.D.N.Y. 2006). This declaration refers to the attack as the "January 17, 2002 Attack."

102. The following U.S. citizens were either killed or injured by the January 17, 2002 Attack: Aharon Ellis, Prince Shaleak, Mellonee Ellis, Jordan Ellis, Francine Ellis, Lynne Ellis, Yihonadav Ellis, Tsaphirah Ellis, Aron Carter, Reuven Carter, Shanon Carter, Shayrah Carter, Amitai Carter, Yoshavyah Carter, and Leslye Knox. *See Knox*, 442 F. Supp. 2d at 81.

103. "Abdul Salaam Sadek Mer'y Hassoun" died perpetrating the January 17, 2002 Attack. *See* Spitzen Decl. ¶ 61.

104. Attached as Exhibit 47 is a true and correct copy of Social Investigation Report documents as to "Abdul Salam Sadek Mer'y Hassoun" ("Hassoun") that Defendants produced in

connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00944 to Shatsky-JD00948, together with a certified translation of such records from Arabic into English. Hassoun's Social Investigation Report reflects that:

- a. On January 17, 2002, Hassoun "was martyred during the execution of his Hadera Martyrdom Operation which killed and injured several Israelis." *See* Ex. 47 at Shatsky-JD00945.
- b. The "Decision of the establishment's director" is for Hassoun "[t]o confirm [Hassoun] as an Al-Aqsa Intifada Martyr," and the "Confirmation of the director general" is Hassoun is "[t]o be confirmed as an Al-Aqsa Intifada Martyr" and be "paid Redacted shekels." *See* Ex. 47 at Shatsky-JD00947.
- c. Hassoun's father, "Sadek Mer'y Hussein Hassoun," Identification No. ^{“Redacted} 5717, is listed as Hassoun's "beneficiary." *See* Ex. 47 at Shatsky-JD00945-46.
- d. Subsequent to the Establishment's decision to confirm Hassoun as a martyr, the Establishment determined that "the payment should be delivered in full to the martyr's father" and "payment to the wife should stop." *See* Ex. 47 at Shatsky-JD00948.

105. Attached as Exhibit 48 are true and correct copies of Martyr Payment Records as to Hassoun that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00103 to Shatsky-JD00107, together with a certified translation of such records from Arabic into English.

106. Hassoun's Martyr Payment Records reflect that the "Case Type" is "Martyr," and that Defendants made monthly payments to his father "Sadek Mer'y Hussein Hassoun"

(Identification No. “^{Redacted} 5717”) between May 2020 and February 2021, totaling 14,000 shekels. Ex. 48 at Shatsky-JD00103, Shatsky-JD00107.

107. *Ala’ Khader al-Hreimi.* A U.S. national was killed or injured in an attack on August 16, 2019, according to the U.S. Department of Justice’s Office of Justice for Victims of Overseas Terrorism (“OVT”). The OVT investigates such overseas terror attacks and provides services to U.S. citizens or family members of U.S. citizens who suffer direct physical, emotional, or financial harm as a result. 34 U.S.C. §§ 20141(e)(2), 20106; 28 C.F.R. § 94.12(u)(1). The OVT does not release the names of such victims, but it publishes the date and location of confirmed attacks harming U.S. citizens or their family members on its website, and the Dolphinarium attack is on the OVT’s list. *See DOJ/OVT Interactive World Map - Near East*, JUSTICE.GOV, <https://www.justice.gov/nsd-ovt/dojovt-interactive-world-map/near-east> (last visited Sept. 21, 2021) (attached as Exhibit 49).

108. “Ala’ Khader al-Hreimi” died perpetrating the attack. *See* Spiten Decl. ¶ 61.

109. Attached as Exhibit 50 is a true and correct copy of Social Investigation Report documents as to “Ala’ Khader Abd Al-Hreimi” (“Hreimi”) that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00751 to Shatsky-JD00754, together with a certified translation of such records from Arabic into English. Hreimi’s Social Investigation Report reflects that:

- a. On August 16, 2019, Hreimi “was martyred after being shot, having been summarily executed by occupation soldiers after attempting a vehicular attack near the settlement of Azar, Bethlehem.” *See* Ex. 50 at Shatsky-JD00752.
- b. The “Decision of the establishment’s director” is to “recommend confirming [Hreimi] as an Al-Aqsa Intifada martyr,” and the “Confirmation of the Chairman

of the Establishment” provides that Hreimi is “[c]onfirmed a martyr. *See* Ex. 50 at Shatsky-JD00754.

c. Hreimi’s “beneficiary” is listed as his wife “Sajda Na’man Issa Ziyada,” (Identification No. “^{Redacted} 3227”). *See* Ex. 50 at Shatsky-JD00752.

110. Attached as Exhibit 51 are true and correct copies of Martyr Payment Records as to Hreimi that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00248 to Shatsky-JD00249, together with a certified translation of such records from Arabic into English.

111. Hreimi’s Martyr Payment Records reflect that the “Case Type” is “Martyr,” and that Defendants made monthly payments to his wife “Sajda Na’man Issa Ziyada” (Identification No. “^{Redacted} 3227”) between May 2020 and April 2021, totaling 24,000 shekels. *See* Ex. 51 at Shatsky-JD00248-49.

112. ***Alaa Hisham Abu Dheim.*** On March 6, 2008, “a 26-year-old Izz al-Din al-Qassam Brigades operative, entered the Merkaz HaRav Yeshiva in Jerusalem. . . . armed with a Kalashnikov assault rifle with nine compatible magazines, two guns (a Beretta pistol and an FN pistol) with four compatible magazines, and a commando knife.” *Force v. Islamic Republic of Iran*, 464 F. Supp. 3d 323, 354 (D.D.C. 2020) (internal citations omitted). He then opened fire on students in front of the building before entering the building and killing more. *See id.*

113. The following U.S. citizens were either killed or injured by the attack: Avraham David Moses, Rivkah Martha Moses, Naftali Andrew Moses, David Moriah, Elisha Dan Moses, N.M., C.M., O.D.M., A.M., Aviad Moriah, Naftali Shitrit, Gila Rachel Shitrit, Meiri Shitrit, Oshrat Shitrit, N.S., Y.S., A.S., E.S., and H.S. *See Force*, 464 F. Supp. 3d at 355. *See also* Ex. 52 (Declaration of Naftali Moses dated December 24, 2017 filed in *Force v. Islamic Republic of*

Iran, No. 16-cv-01468 (RDM) (D.D.C. Mar. 1, 2018) (ECF No. 66)) (stating “I hold both American and Israeli citizenship. I was born in New York, USA,” describing his son’s (Avraham David Moses) death as a result of the March 6, 2008 attack, and his family’s resulting injuries).

114. “Alaa Hisham Abu Dheim” died perpetrating the attack. *See* Spitzen Decl. ¶ 61.

115. Attached as Exhibit 53 is a true and correct copy of Social Investigation Report documents as to “Alaa A-Din Hisham Hussein Abu Adheim” (“Adheim”) that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00681 to Shatsky-JD00684, together with a certified translation of such records from Arabic into English. Adheim’s Social Investigation Report reflects that:

- a. On March 6, 2008, Adheim “became a martyr after an exchange of fire between him and soldiers in a Jewish school in Western Jerusalem, which occurred after he penetrated it wearing Jewish clothes and carrying a weapon. He opened fire at the students and teachers, killing 8. The Israelis then fired at him, and he became a martyr on the spot.” *See* Ex. 53 at Shatsky-JD00682.
- b. The “Decision of the establishment’s director” states that Adheim “became a martyr during an exchange of fire between him and the occupation soldiers in a religious school in West Jerusalem on 3.6.2008,” and the “Confirmation of the director general” provides that Adheim “is confirmed as a martyr.” *See* Ex. 53 at Shatsky-JD00684.
- c. Adheim’s “beneficiary” is listed as his father “Hisham Hussein Qasem Abu Adheim” (Identification No. “^{Redacted} 5492”). *See* Ex. 53 at Shatsky-JD00682-83.

116. Attached as Exhibit 54 are true and correct copies of Martyr Payment Records as to Adheim that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00220 to Shatsky-JD00224, together with a certified translation of such records from Arabic into English.

117. Adheim's Martyr Payment Records reflect that the "Case Type" is "Martyr," and that Defendants made monthly payments to his father and beneficiary "Hisham Hussein Qasem Abu Adheim" (Identification No. "^{Redacted} 5492") between May 2020 and April 2021, totaling 20,400 shekels. *See* Ex. 54 at Shatsky-JD00220, Shatsky-JD00224.

118. *Ali Ja'ara*. The following U.S. citizens received a judgment in *Sokolow v. Palestine Liberation Org.*, No. 04 CIVIL 00397 (GBD), 2015 WL 10852003 (S.D.N.Y. Oct. 1, 2015), *vacated and remanded sub nom. Waldman v. Palestine Liberation Org.*, 835 F.3d 317 (2d Cir. 2016), under 18 U.S.C. § 2333 for injuries caused by a terrorist attack in Jerusalem on January 29, 2004: Karen Shifra Goldberg, Chana Bracha Goldberg, Esther Zahava Goldberg, Yitzhak Shalom Goldberg, Shoshana Malka Goldberg, Eliezer Simcha Goldberg, Yaakov Moshe Goldberg, and Tzvi Yehoshua Goldberg. *See* *Sokolow*, 2015 WL 10852003, at *3. This declaration refers to the attack as the "January 29, 2004 Attack."

119. "Ali Ja'ara" died perpetrating the January 29, 2004 Attack. *See* Spitzen Decl. ¶ 61.

120. Attached as Exhibit 55 is a true and correct copy of Social Investigation Report documents as to "Ali Munir Yousuf Ju'ara" ("Ju'ara") that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00634 to Shatsky-JD00637, together with a certified translation of such records from Arabic into English. Ju'ara's Social Investigation Report reflects that:

a. On January 29, 2004, Ju’ara “became a martyr having perpetrated a martyrdom operation in Western Jerusalem, when he blew herself [sic] up in an Israeli bus.” *See* Ex. 55 at Shatsky-JD00635.

b. The “Decision of the establishment’s director” states that Ju’ara “should be confirmed as a martyr of the Al-Aqsa Intifada,” and the “Confirmation of the director general” provides that Ju’ara “is confirmed as a martyr of the Al-Aqsa Intifada” and “will be paid [redacted] shekels a month.” *See* Ex. 55 at Shatsky-JD00637.

c. Ju’ara’s “beneficiary” is listed as his father, “Munir Yousuf Khalil Ju’ara,” Identification No. “^{Redacted}0362.” *See* Ex. 55 at Shatsky-JD00635-636.

121. Attached as Exhibit 56 are true and correct copies of Martyr Payment Records as to Ju’ara that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00204 to Shatsky-JD00208, together with a certified translation of such records from Arabic into English.

122. Ju’ara’s Martyr Payment Records reflect that the “Case Type” is “Martyr,” and that Defendants made monthly payments to his father and beneficiary “Munir Yousuf Khalil Ju’ara” (Identification No. “^{Redacted}0362”) between May 2020 and April 2021, totaling 16,800 shekels. Ex. 56 at Shatsky-JD00204, Shatsky-JD00208.

123. ***Anwar Mohammed Atiyyah Sukar and Salah Abd al-Hamid Shaker Mohammad.*** U.S. citizen Gila Afriat-Kurtzer was injured in a suicide bombing at the Beit Lid junction near Netanya on January 22, 1995. *See* Amended Complaint at 13, 15, *Afriat-Kurtzer v. Arab Bank*, No. 05-cv-0388 (BMC) (PK) (E.D.N.Y. Feb. 25, 2005), ECF No. 3; *Almog v. Arab Bank, PLC*, 471 F. Supp. 2d 257, 264 (E.D.N.Y. 2007).

124. According to Westlaw's PeopleMap (the online service providing information about public records), Gila Afriat-Kurtzer was born in 1974 and received a social security number in Maryland in 1985 or 1986. *See* Ex. 57 (copy of PeopleMap report).

125. Two suicide terrorists died perpetrating the attack: "Anwar Mohammed Atiyyah Sukar" and "Salah Abd al-Hamid Shaker Mohammad." *See* Spitzen Decl. ¶ 61.

126. Attached as Exhibit 58 is a true and correct copy of Social Investigation Report documents as to "Anwar Muhammad Atiya Sukar" ("Sukar") that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00784 to Shatsky-JD00788 and Shatsky-JD00798, together with a certified translation of such records from Arabic into English. Sukar's Social Investigation Report reflects that:

- a. On January 22, 1995, Sukar committed a "martyrdom operation. Explosion in a restaurant in Dizengoff Street, Tel Aviv. The operation was named the Beit Lid Operation. The Islamic Jihad took responsibility[*] for it." *See* Ex. 58 at Shatsky-JD00786.
- b. The "Decision of the establishment's director" states that "[a]ccording to the decision of the honorable minister, he is to be confirmed as a martyr of the homeland." *See* Ex. 58 at Shatsky-JD00788.
- c. Sukar's "beneficiary" is listed as his mother "Ma'zuza Misbah Ahmad Sukar," (Identification No. "Redacted 2859"). *See* Ex. 58 at Shatsky-JD00786.

127. Attached as Exhibit 59 are true and correct copies of Martyr Payment Records as to Sukar that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00022 to Shatsky-JD00026, together with a certified translation of such records from Arabic into English.

128. Sukar's Martyr Payment Records reflect that the "Case Type" is "Martyr," and that Defendants made monthly payments to his mother and beneficiary "Ma'zuza Misbah Ahmad Sukar" (Identification No. "^{Redacted}2859") between May 2020 and April 2021, totaling 16,800 shekels. *See* Ex. 59 at Shatsky-JD00022, Shatsky-JD00026.

129. Attached as Exhibit 60 is a true and correct copy of Social Investigation Report documents as to "Salah Abd al-Hamid Shaker Mohammad" ("Shaker") that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00799 to Shatsky-JD00804, together with a certified translation of such records from Arabic into English. Shaker's Social Investigation Report reflects that:

- a. The January 22, 1995 "incident happened after the abovementioned person detonated himself using an explosive belt during the Israeli [illegible] in the area of Beit Lid. This caused his death and the death of another youth called Anwar Sukar from Gaza, in addition to the killing and injuring of dozens of Israeli soldiers." *See* Ex. 60 at Shatsky-JD00801.
- b. The "Decision of the establishment's director" states that Shaker "is to be confirmed as a martyr of the homeland" and receive a "Monthly allowance." *See* Ex. 60 at Shatsky-JD00803.
- c. Shaker's "beneficiary" is listed as his mother, "Maryam Abdallah Ibrahim Mohammad" (Identification No. "^{Redacted}2455"). *See* Ex. 60 at Shatsky-JD00801.

130. Attached as Exhibit 61 are true and correct copies of Martyr Payment Records as to Shaker that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00027 to Shatsky-JD00031, together with a certified translation of such records from Arabic into English.

131. Shaker's Martyr Payment Records reflect that the "Case Type" is "Martyr," and that Defendants made monthly payments to his mother and beneficiary "Maryam Abdallah Ibrahim Mohammad" (Identification No. "^{Redacted}2455") between May 2020 and April 2021, totaling 16,800 shekels. *See* Ex. 61 at Shatsky-JD00027, Shatsky-JD000 Shatsky-JD00031.

132. ***Asem Yousef Mohamed Hamed.*** On December 12, 2001, a suicide terrorist detonated a roadside bomb next to the Number 189 bus, causing it to swerve off of the road near Emmanuel. He then opened fire with an automatic assault rifle, killing and injuring many individuals. Among those injured by the attack were U.S. citizens: Benyamin Andrew Pilant, Rebecca Pilant, Samuel Philips Haistings Pilant, Robert Eliot Haistings Pilant, and Elizabeth Anna Haistings Pilant. Based on their injuries, the above-named victims brought a federal action under 28 U.S.C. § 1605A and other statutes against the Islamic Republic of Iran and other parties. *See* Complaint ¶¶ 19, 23–25, *Pilant v. Islamic Republic of Iran*, No. 11-cv-1077 (RMC) (D.D.C. June 9, 2011), ECF No. 3.

133. The *Pilant* complaint, signed by attorneys Gavriel Mairone of MM-Law LLC and Michael Miller of The Miller Firm LLC, states that the above-named victims were U.S. citizens. *See id.* ¶¶ 18, 23-25.

134. "Asem Yousef Mohamed Hamed (a/k/a Assem Yousef Rihan)" died perpetrating the attack. *See* Spitzen Decl. ¶ 61.

135. Attached as Exhibit 62 is a true and correct copy of Social Investigation Report documents as to "Asem Yousef Mohammed Hamad" ("Asem Hamad") that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00931 to Shatsky-JD00934 and Shatsky-JD00936, together with a certified

translation of such records from Arabic into English. Asem Hamad's Social Investigation Report reflects that:

- a. On December 12, 2001, Asem Hamad "was martyred as a result of his martyrdom operation near the settlement Emanuel. The martyr planted an explosive device on the road and then opened fire at the bus, which killed 10 people and injured 20." *See* Ex. 62 at Shatsky-JD00932.
- b. The "Decision of the establishment's director" states that Asem Hamad "was martyred when the occupation forces opened fire at him on 12.12.2001" and recommended "to confirm him as an Al-Aqsa Martyr," and the "Confirmation of the director general" states that Asem Hamad is "[t]o be confirmed as an Al-Aqsa Martyr," and is to be "paid [Redacted] shekels a month." *See* Ex. 62 at Shatsky-JD00934, Shatsky-JD00936.
- c. Asem Hamad's "beneficiary" is listed as his father, "Yousef Mohammed Yousef Hamad" (Identification No. "^{Redacted}7711"). *See* Ex. 62 at Shatsky-JD00932-33.

136. Attached as Exhibit 63 are true and correct copies of Martyr Payment Records as to Asem Hamad that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00098 to Shatsky-JD00102, together with a certified translation of such records from Arabic into English.

137. Asem Hamad's Martyr Payment Records reflect that the "Case Type" is "Martyr," and that Defendants made monthly payments to his father "Yousuf Muhammad Yousuf Abu Reihan" (Identification No. "^{Redacted}7711") between May 2020 and April 2021, totaling 16,800 shekels. *See* Ex. 63 at Shatsky-JD00098, Shatsky-JD00102.

138. **Bahaa Muhammad Khalil Alyan.** “On the morning of October 13, 2015, two Hamas operatives . . . boarded Egged bus number 78 in the Armon Hanatziv neighborhood of Jerusalem. [One terrorist] was armed with a gun, and [the other] carried a knife. They hid their weapons under their clothing and waited for the bus to pick up other passengers. When the bus became full, [one terrorist] proceeded to the back, where he shot passengers at close range. [The other] used his knife to stab passengers near the front of the bus.” *See Force*, 464 F. Supp. 3d at 346-47 (internal citations omitted). This declaration refers to the attack as the “October 13, 2015 Attack.”

139. The following U.S. citizens were either killed or injured by the October 13, 2015 Attack: Richard Lakin, Micah Lakin Avni, and Manya Lakin. *See id.*

140. “Bahaa Muhammad Khalil Alyan” (“Alyan”) died perpetrating the October 13, 2015 Attack. *See* Spitzen Decl. ¶ 61.

141. Attached as Exhibit 64 is a true and correct copy of Social Investigation Report documents as to Alyan that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00717 to Shatsky-JD00720, together with a certified translation of such records from Arabic into English. Alyan’s Social Investigation Report reflects that:

- a. On October 13, 2015, Alyan was killed because “he stabbed a group of settlers in an Israeli bus in the Al-Mukabbar area.” *See* Ex. 64 at Shatsky-JD00718.
- b. The “Decision of the establishment’s director” recommended Alyan “be confirmed as an Al-Aqsa Martyr, following his summary execution by the occupation soldiers on the pretext that he stabbed a settler in a bus” and the “Confirmation of the director general” states Alyan “is to be confirmed as an Al-

Aqsa martyr,” and Alyan is to “be paid 1700 Shekels a month...” *See* Ex. 64 at Shatsky-JD00720.

c. Alyan’s “beneficiary” is listed as his father, “Muhammad Khalil Muhammad Alyan” (Identification No. “^{Redacted}7810”). *See* Ex. 64 at Shatsky-JD00718-19.

142. Attached as Exhibit 65 are true and correct copies of Martyr Payment Records as to Alyan that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00237 to Shatsky-JD00240, together with a certified translation of such records from Arabic into English.

143. Alyan’s Martyr Payment Records reflect that the “Case Type” is “Martyr,” and that Defendants made monthly payments to his father “Muhammad Khalil Muhammad Alyan” (Identification No. “^{Redacted}7810”) between May 2020 and April 2021, totaling 20,400 shekels. *See* Ex. 65 at Shatsky-JD00237, Shatsky-JD00239.

144. ***Basem Jamal Darwish al-Takruri.*** On May 18, 2003, a suicide terrorist detonated an explosive device on a bus on French Hill in Jerusalem. *See Suicide Terrorists in the Current Conflict*, ISRAELI SECURITY AGENCY at 6 (a copy of the relevant sections of the translated report is attached as Exhibit 44); Declaration of Itzhak Ilan 1-3, *Shatsky v. Syrian Arab Republic*, No. 08-cv-0496 (RJL) (D.D.C. Sept. 15, 2020), ECF No. 50-1. This declaration refers to the attack as the “May 18, 2003 Attack.”

145. The following U.S. citizens were either killed or injured by the May 18, 2003 Attack: Steven Averbach, Tamir Averbach, Devir Averbach, Sean Averbach, Adam Averbach, David Averbach, Maida Averbach, Michael Averbach, Eileen Sapadin. Based on their injuries, the above-named victims brought a federal action under 18 U.S.C. § 2333 and other statutes against Cairo Amman Bank. *See* Amended Complaint at 2-10, *Averbach v. Cairo Amman Bank*,

No. 19-cv-00004 (GHW) (KHP) (S.D.N.Y. Apr. 8, 2020), ECF No. 63. The complaint, signed by attorney Ari Ungar of Osen LLC, states that the above-named victims were U.S. citizens. *See id* at 3-10, 169.

146. “Basem Jamal Darwish al-Takruri” died perpetrating the May 18, 2003 Attack. *See* Spitzen Decl. ¶ 61.

147. Attached as Exhibit 66 is a true and correct copy of Social Investigation Report documents as to “Basem Jamal Darwish Takruri” (“Takruri”) that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00587 to Shatsky-JD00590, together with a certified translation of such records from Arabic into English. Takruri’s Social Investigation Report reflects that:

- a. On May 18, 2003 in “Jerusalem, French Hill,” there was a “[p]erpetration of a martyrdom Operation in an Israeli bus.” *See* Ex. 66 at Shatsky-JD00588.
- b. The “Decision of the establishment’s director” states “[t]o be confirmed as a martyr of the Al-Aqsa Intifada,” and the “Confirmation of the director general” states Takruri is “confirmed as a martyr of the Al-Aqsa Intifada,” and Takruri “[w]ill be paid [redacted] shekels a month.” *See* Ex. 66 at Shatsky-JD00590.
- c. Takruri’s “beneficiary” is listed as his mother “Faiza Muhammad Ibrahim Abd Al-Hay Ghalma” (Identification No. “^{Redacted}0932”). *See* Ex. 66 at Shatsky-JD00588-89.

148. Attached as Exhibit 67 are true and correct copies of Martyr Payment Records as to Takruri that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00179 to Shatsky-JD00183, together with a certified translation of such records from Arabic into English.

149. Takruri's Martyr Payment Records reflect that the "Case Type" is "Martyr," and that Defendants made monthly payments to Takruri's mother "Faiza Muhammad Ibrahim Abd Al-Hay Takruri" (Identification No. "Redacted 0932") between May 2020 and April 2021, totaling 15,400 shekels. *See* Ex. 67 at Shatsky-JD00179, Shatsky-JD00183.

150. ***Bashar Muhammad As'ad Sawalha, Yousef Jameel Ahmad Shuli, and Khalil Ibrahim Tawfiq Sharif.*** On September 4, 1997, "three Hamas suicide bombers with cases of powerful explosive bombs arrived at the crowded Ben Yehuda Street pedestrian mall in downtown Jerusalem. The bombers packed the bombs with nails, screws, pieces of glass, and chemical poisons to cause maximum pain, suffering, and death." *See Campuzano v. Islamic Republic of Iran*, 281 F. Supp. 2d 258, 261 (D.D.C. 2003) (internal citations omitted).

151. U.S. citizen Yael Botvin was killed in the attack. *See Foreign Operations, Export Financing, and Related Programs Appropriations for Fiscal Year 2000*, S. Comm. On Appropriations, 106th Cong. 58 (1999) at 58 (statement of Mark M. Richard, U.S. Assistant Attorney General), attached as Exhibit 68.

152. The following U.S. citizens were also injured by the attack: Diana Campuzano, Avi Elishis, Gregg Salzman, Jenny Rubin, Daniel Miller, Abraham Mendelson, Stuart Hersh, Noam Rozenman, Deborah Rubin, Renay Frym, Elena Rozenman, Tzvi Rozenman. *See Campuzano*, 281 F. Supp. 2d at 261, 263-68.

153. The following individuals died perpetrating the attack: "Bashar Mohammad As'ad Sawalha," "Yousef Jameel Ahmad Shuli," and "Khalil Ibrahim Tawfiq Sharif." *See* Spitzen Decl. ¶ 61.

154. Attached as Exhibit 69 is a true and correct copy of Social Investigation Report documents as to "Bashar Muhammad As'ad Sawalha" ("Sawalha") that Defendants produced in

connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00852 to Shatsky-JD00855, together with a certified translation of such records from Arabic into English. Sawalha's Social Investigation Report reflects that:

- a. On September 4, 1997, Sawalha "was martyred as a result of executing a martyrdom operation in West Jerusalem, which caused the death of five Israelis and the injury of many others." *See* Ex. 69 at Shatsky-JD00853.
- b. The "Decision of the establishment's director" recommended "to confirm him as a martyr," and the "Confirmation of the director general" states Sawalha "is to be confirmed as a martyr" and be "paid [Redacted] shekels a month." *See* Ex. 69 at Shatsky-JD00855.
- c. Sawalha's sister's name is listed as "Hiba." *See* Ex. 69 at Shatsky-JD00854.

155. Attached as Exhibit 70 are true and correct copies of Martyr Payment Records as to Sawalha that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00057 to Shatsky-JD00062, together with a certified translation of such records from Arabic into English.

156. Sawalha's Martyr Payment Records reflect that the "Case Type" is "Martyr," and that Defendants made monthly payments to Sawalha's sister ("Hiba Muhammad As'ad Sawalha") between May 2020 and April 2021 totaling 16,800 shekels. *See* Ex. 70 at Shatsky-JD00057, Shatsky-JD00061-2.

157. Attached as Exhibit 71 is a true and correct copy of Social Investigation Report documents as to "Yousuf Jamil Ahmad Shuli" ("Shuli") that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00858 and

Shatsky-JD00861 to Shatsky-JD00864, together with a certified translation of such records from Arabic into English. Shuli's Social Investigation Report reflects that:

- a. On September 4, 1997, Shuli "was martyred in a martyrdom operation in a commercial market in West Jerusalem." *See* Ex. 71 at Shatsky-JD00862, Shatsky-JD00864.
- b. The "Decision of the establishment's director" recommended "to confirm him as a martyr," and the "Confirmation of the director general" states Shuli "is to be confirmed as a martyr" and "paid [Redacted] shekels a month." *See* Ex. 71 at Shatsky-JD00864.
- c. Shuli's mother's name is "Amna Hasan Mustafa Shuli" (Identification No. ^{“Redacted} 5526"). *See* Ex. 71 at Shatsky-JD00862.
- d. Shuli's "payment is to be sent to the mother starting on 4.1.2012 ... because the father died ..." *See* Ex. 71 at Shatsky-JD00858.

158. Attached as Exhibit 72 are true and correct copies of Martyr Payment Records as to Shuli that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00063 to Shatsky-JD00067, together with a certified translation of such records from Arabic into English.

159. Shuli's Martyr Payment Records reflect that the "Case Type" is "Martyr" and that Defendants made monthly payments to Shuli's mother "Amna Hasan Mustafa Shuli" (Identification No. ^{“Redacted} 5526") between May 2020 and April 2021 totaling 16,800 shekels. Ex. 72 at Shatsky-JD00063, Shatsky-JD00067.

160. Attached as Exhibit 73 is a true and correct copy of Social Investigation Report documents as to "Khalil Ibrahim Tawfiq A-Sharif" ("Sharif") that Defendants produced in

connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00867 to Shatsky-JD00870, together with a certified translation of such records from Arabic into English. Sharif's Social Investigation Report reflects that:

- a. On September 4, 1997, Sharif "was martyred during the execution of a martyrdom operation in Mahne Yehuda Market ... which caused the death of five settlers and injured many others." *See* Ex. 73 at Shatsky-JD00868.
- b. The "Decision of the establishment's director" states "I recommend to confirm him as a martyr," and the "Confirmation of the director general" states Sharif "is to be confirmed as a martyr" and be "paid [Redacted] shekels a month." *See* Ex. 73 at Shatsky-JD00870.
- c. Sharif's "beneficiary" is listed as his father "Ibrahim Tawfiq Ahmad A-Sharif" (Identification No. "^{Redacted}8327"). *See* Ex. 73 at Shatsky-JD00868.

161. Attached as Exhibit 74 are true and correct copies of Martyr Payment Records as to Sharif that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00068 to Shatsky-JD00072, together with a certified translation of such records from Arabic into English.

162. Sharif's Martyr Payment Records reflect that the "Case Type" is "Martyr," and that Defendants made monthly payments to Sharif's father and beneficiary "Ibrahim Tawfiq Ahmad Sharif" (Identification No. "^{Redacted}8327") between May 2020 and April 2021, totaling 16,800 shekels. *See* Ex. 74 at Shatsky-JD00068, Shatsky-JD00072.

163. ***Fadi Ahmad Hamdan Al-Qunbar.*** A U.S. national was killed or injured in an attack in Jerusalem on January 8, 2017, according to the U.S. Department of Justice's OVT. *See DOJ/OVT Interactive World Map - Near East*, Justice.gov, <https://www.justice.gov/nsd>

ovt/dojovt-interactive-world-map/near-east (last visited Sept. 21, 2021), a copy of which is attached as Exhibit 49.

164. “Fadi Ahmad Hamdan Al-Qunbar” died perpetrating the attack. *See* Spitzen Decl. ¶ 61.

165. Attached as Exhibit 75 is a true and correct copy of Social Investigation Report documents as to “Fadi Ahmad Hamdan Qumbar” (“Qumbar”) that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00740 to Shatsky-JD00743, together with a certified translation of such records from Arabic into English. Qumbar’s Social Investigation Report reflects that:

- a. On January 8, 2017, Qumbar died after “he ran over a group of soldiers with a car in the Al-Mukabbar area.” *See* Ex. 75 at Shatsky-JD00741.
- b. The “Decision of the establishment’s director” recommended that Qumbar “be confirmed as an Al-Aqsa Martyr,” and “be paid a Jerusalem Increment.” The “Confirmation of the director general” states Qumbar “is to be confirmed as an Al-Aqsa martyr” and “be paid 2600 Shekels a month, in addition to [redacted] Shekels, to be paid with his first allowance.” *See* Ex. 75 at Shatsky-JD00743.
- c. Qumbar’s beneficiary is listed as his wife “Tahani Aref Jamil Qumbar,” (Identification No. “^{Redacted} 5232”). *See* Ex. 75 at Shatsky-JD00741.

166. Attached as Exhibit 76 are true and correct copies of Martyr Payment Records as to Qumbar that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00245 to Shatsky-JD00247, together with a certified translation of such records from Arabic into English.

167. Qumbar's Martyr Payment Records reflect that the "Case Type" is "Martyr," and that Defendants made monthly payments to Qumbar's wife and beneficiary "Tahani Urf Jamil Qunbar" (Identification No. "Redacted 5232") between May 2020 and April 2021 totaling 34,800 shekels. *See* Ex. 76 at Shatsky-JD00245, Shatsky-JD00247.

168. ***Fadi Attallah Yusuf Amer.*** On March 28, 2001, Americans Netanel, Martin, Yaakov, and Pearl Herskovitz were injured when a suicide bomber "blew himself up outside a gas station near Kfar Sava," outside Tel Aviv, killing two people and injuring four others. *See* Third Amended Complaint at 68-69, *Strauss v. Crédit Lyonnais, S.A.*, No. 06-cv-0702 (DLI) (RML) (E.D.N.Y. Jan. 28, 2008), ECF No. 127; Order on Motion for Summary Judgment, *Strauss v. Crédit Lyonnais, S.A.*, No. 06-cv-0702 (DLI) (MDG) (E.D.N.Y. Feb. 28, 2013), ECF No. 340 (discussing the Third Amended Complaint).

169. "Fadi Attallah Yusuf Amer" died perpetrating the attack. *See* Spitzen Decl. ¶ 61.

170. Attached as Exhibit 77 is a true and correct copy of Social Investigation Report documents as to "Fadi Atallah Yousuf Abdel Jaber Amer" ("Amer") that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00878 to Shatsky-JD00881, together with a certified translation of such records from Arabic into English. Amer's Social Investigation Report reflects that:

- a. There was "[a] martyrdom operation inside Israel" on March 28, 2001 in Neve Yamin. *See* Ex. 77 at Shatsky-JD00879.
- b. The "Confirmation of the director general" states Amer "is to be confirmed as a martyr of the Al-Aqsa Martyrs," and be "paid [Redacted] shekels a month." *See* Ex. 77 at Shatsky-JD00881.

c. Amer's mother is listed as "Nuhayl Adel Sa'du Al-Ras" (Identification No. "Redacted 1948"). *See* Ex. 77 at Shatsky-JD00879.

171. Attached as Exhibit 78 are true and correct copies of Martyr Payment Records as to Amer that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00073 to Shatsky-JD00077, together with a certified translation of such records from Arabic into English.

172. Amer's Martyr Payment Records reflect that the "Case Type" is "Martyr," and that Defendants made monthly payments to Qumbar's mother "Nuhayl Adel Sa'du Amer" (Identification No. "Redacted 1948") between May 2020 and April 2021, totaling 16,800 shekels. *See* Ex. 78 at Shatsky-JD00073, Shatsky-JD00077.

173. ***Muhsin Muhammad Omar al-Qawasmeh and Fadi Ziyad Muhammad Fakhoury.*** On March 7, 2003, U.S. citizens Eli Natan and Debra Ruth Horovitz were murdered in their apartment in Kiryat Arba when terrorists disguised as students infiltrated Kiryat Arba and killed both of them. The following U.S. citizens were also injured by the attack: Moshe Horovitz, Leah Horovitz, Shulamite Horovitz, Batsheva Horovitz, Nechama Horovitz, Tvi Horovitz, Ari Horovitz, David Horovitz, Tovi Horovitz, Uri Horovitz, Bernice Wolf, Stanley Wolf, Brian Wolf. Based on their injuries, the above-named victims brought a federal action under 18 U.S.C. § 2333 and other statutes against Arab Bank, PLC. *See* Second Amended Complaint at 3, 23-27, *Litle v. Arab Bank, PLC*, No. 04-cv-5449 (NG) (VVP) (E.D.N.Y. Apr. 10, 2007), ECF No. 307. The complaint, signed by attorney Mark S. Werbner of Sayles Werbner P.C., states that the above-named victims were U.S. citizens. *See* *Litle* Second Amended Complaint at 23-27, 107.

174. “Muhsin Muhammad Omar al-Qawasmeh” (“Muhsin Qawasmeh”) and “Fadi Ziyad Muhammad Fakhoury” (“Fakhoury”) died perpetrating the attack. *See* Spitzen Decl. ¶ 61.

175. Attached as Exhibit 79 is a true and correct copy of Social Investigation Report documents as to Muhsin Qawasmeh that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00566 to Shatsky-JD00569, together with a certified translation of such records from Arabic into English. Muhsin Qawasmeh’s Social Investigation Report reflects that:

- a. An “[a]rmed confrontation inside Kiryat Arba Settlement in the city of Hebron, which cause [sic] his martyrdom” on March 7, 2003. *See* Ex. 79 at Shatsky-JD00567.
- b. The “Confirmation of the director general” states Muhsin Qawasmeh is “[c]onfirmed as a martyr,” and “[w]ill be paid [illegible] shekels a month.” *See* Ex. 79 at Shatsky-JD00569.
- c. Muhsin Qawasmeh’s “beneficiary” is listed as his mother “Ismahan Othman Badr Qawasmeh” (Identification No. “^{Redacted} 2985”). *See* Ex. 79 at Shatsky-JD00567.

176. Attached as Exhibit 80 are true and correct copies of Martyr Payment Records as to Muhsin Qawasmeh that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00169 to Shatsky-JD00173, together with a certified translation of such records from Arabic into English.

177. Muhsin Qawasmeh’s Martyr Payment Records reflect that the “Case Type” is “Martyr,” and that Defendants made monthly payments to his mother and beneficiary “Ismahan Othman Badr Al-Qawasmeh” (Identification No. “^{Redacted} 9851 [*]”) between May 2020 and April 2021 totaling 16,800 shekels. Ex. 80 at Shatsky-JD00169, Shatsky-JD00173.

178. Attached as Exhibit 81 is a true and correct copy of Social Investigation Report documents as to Fakhoury that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00575 to Shatsky-JD00578, together with a certified translation of such records from Arabic into English. Fakhoury's Social Investigation Report reflects that:

- a. Fakhoury was in an “[a]rmed confrontation inside Kiryat Arba Settlement, followed by detonation of an explosive belt worn by the martyr” on March 7, 2003. *See* Ex. 81 at Shatsky-JD00576.
- b. The “Confirmation of the director general” states Fakhoury is “[c]onfirmed as a martyr of the Al-Aqsa Intifada,” and “[w]ill be paid [redacted] shekels a month.” *See* Ex. 81 at Shatsky-JD00578.
- c. Fakhoury’s beneficiary is listed as his father “Ziyad Muhammad Khalawi Fakhoury” (Identification No. “[cut off]^{Redacted} 1148”). *See* Ex. 81 at Shatsky-JD00576-77.

179. Attached as Exhibit 82 are true and correct copies of Martyr Payment Records as to Fakhoury that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00174 to Shatsky-JD00178, together with a certified translation of such records from Arabic into English.

180. Fakhoury’s Martyr Payment Records reflect that the “Case Type” is “Martyr,” and that Defendants made monthly payments to Fakhoury’s father and beneficiary “Ziyad Muhammad Khalawi Fakhoury” (Identification No. “[^{Redacted} 1148”]) between May 2020 and April 2021, totaling 16,800 shekels. *See* Ex. 82 at Shatsky-JD00174, Shatsky-JD00178.

181. ***Uday Abu Jamal and Ghassan Muhammad Ali Abu Jamil.*** On November 18, 2014, two terrorists entered the Kehillat Bnei Torah buildings in the Har Nof neighborhood in Jerusalem with a gun and butcher knives and began attacking worshippers, stabbing them before opening fire. *See Terror Attack in Jerusalem Synagogue*, ISRAEL MINISTRY OF FOREIGN AFFAIRS (Nov. 18, 2014), a copy of which is attached as Exhibit 83.

182. The following U.S. citizens were killed in the attack: Aryeh Kupinsky and Moshe Twersky. Based on their injuries, the above-named victims brought a federal action under 28 U.S.C. § 1605A and other statutes against the Syrian Arab Republic. *See Amended Complaint at 5, 7-9, Heching v. Syrian Arab Republic*, No. 17-cv-1192 (TSC) (D.D.C. July 25, 2017), ECF No. 6. The complaint, signed by attorney Asher Perlin of his eponymous firm, states that the above-named victims were U.S. citizens. *See id.* at 7-9, 37.

183. “Uday Abu Jamal” and “Ghassan Muhammad Abu Jamil” died perpetrating the attack. *See* Spitzen Decl. ¶ 61.

184. Attached as Exhibit 84 is a true and correct copy of Social Investigation Report documents as to “Ghassan Muhammad Ali Abu Jamil” (“Ghassan Jamil”) that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00707 to Shatsky-JD00709 and Shatsky-JD02066, together with a certified translation of such records from Arabic into English. Ghassan Jamil’s Social Investigation Report reflects that:

- a. On November 18, 2014, “[d]uring an attack of the martyr and his cousin, Uday Abu Jamal, against the Har Nof Religious Center in Jerusalem, in the area of Dir Yasin, a confrontation occurred between the martyr and the center’s guards. He

was martyred on the spot following a fight in which more than five Israelis were killed in the center.” *See* Ex. 84 at Shatsky-JD02066.

- b. The “Decision of the establishment’s director” states that Ghassan Jamil “be confirmed as a martyr of the Al-Aqsa martyrs” and that “[t]he beneficiary for the martyr is his widow, Nadia Musa Hijazi Abu Jamil, ID number (Redacted 7919).” Ex. 84 at Shatsky-JD0709.
- c. The “Confirmation of the director general” states that Ghassan Jamil “is confirmed as a martyr of the Al-Aqsa Intifada” and he “will receive a martyr payment of 2700 Shekels a month, in addition to the President’s honorary payment of 6000 shekels which will be added once to the first allowance.” Ex. 84 at Shatsky-JD0709.

185. Attached as Exhibit 85 are true and correct copies of Martyr Payment Records as to “Ghassan Muhammad Ali Abu Jamal” that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00233 to Shatsky-JD00236, together with a certified translation of such records from Arabic into English.

186. “Ghassan Muhammad Ali Abu Jamal’s” Martyr Payment Records reflects that the “Case Type” is “Martyr,” and that Defendants made monthly payments to his wife and beneficiary “Nadia Salama Mussa Abu Jamal” (Identification No. “Redacted 7919”) between May 2020 and April 2021 totaling 32,400 shekels. *See* Ex. 85 at Shatsky-JD00233, Shatsky-JD00236.

187. Attached as Exhibit 86 is a true and correct copy of Social Investigation Report documents as to “Uday Abd Ali Mussa Abu Jamal” (“Uday Jamal”) that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-

JD00699 to Shatsky-JD00702, together with a certified translation of such records from Arabic into English. Uday Jamal's Social Investigation Report reflects that:

- a. On November 18, 2014, “[d]uring the martyr's attack against a religious center (Har Nof) in Jerusalem, in the Deir Yassin area,” Uday Jamal “battled the center's guards. He was martyred immediately after the battle, having killed more than five Israelis in the center.” *See* Ex. 86 at Shatsky-JD00700.
- b. The “Decision of the establishment's director” recommends “that the case will be confirmed as an Al-Aqsa Martyr” and the “Confirmation of the director general” states that Uday Jama “is confirmed as a martyr of the Al-Aqsa Intifada” and he “will receive a martyr payment of 1700 Shekels a month according to the regulations, in addition to the President's honorary payment of 6000 shekels which will be added once to the first allowance.” *See* Ex. 86 at Shatsky-JD00702.
- c. Uday Jamal's “beneficiary” is listed as his mother “Fatma Hussein Mussa Abu Jamal” (Identification No. “^{Redacted}4072”). *See* Ex. 86 at Shatsky-JD00700.

188. Attached as Exhibit 87 are true and correct copies of Martyr Payment Records as to Uday Jamal that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00229 to Shatsky-JD00232, together with a certified translation of such records from Arabic into English.

189. Uday Jamal's Martyr Payment Records reflects that the “Case Type” is “Martyr,” and that Defendants made monthly payments to his beneficiary and mother “Fatma Hussein Mussa Abu Jamal” (Identification No. “^{Redacted}4072”) between May 2020 and April 2021 totaling 20,400 shekels. *See* Ex. 87 at Shatsky-JD00229, Shatsky-JD00232.

190. ***Hanadi Taysir Abd al-Malik Jaradat.*** On October 4, 2003, U.S. citizen Chaya Ben-Zaken Zilberstein, who was pregnant at the time, was in the Maxim Restaurant in Haifa when a suicide terrorist detonated an explosive device, severely injuring her and killing 21 others. *See Suicide Terrorists in the Current Conflict*, ISRAELI SECURITY AGENCY at 5 (relevant sections of the translated report are attached as Ex. 44); Declaration of Itzhak Ilan 1–3; *Shatsky v. Syrian Arab Republic*, No. 08-cv-0496 (RJL) (D.D.C. Sept. 15, 2020), ECF No. 50-1; Exhibit 88 (Declaration of Clara Ben-Zaken dated November 10, 2020 filed in *Sokolow v. Palestine Liberation Org.*, No. 04-cv-0397 (GBD) (RLE) (S.D.N.Y. Nov. 12, 2020) (ECF. No 1018-25) (stating she and her sister Chaya Ben-Zaken Zilberstein are U.S. citizens, and she was injured by Chaya’s injuries in the attack).

191. Suicide terrorist “Hanadi Taysir Abd al-malik Jaradat” (“Jaradat”) died perpetrating the attack. *See* Spitzen Decl. ¶ 61.

192. Attached as Exhibit 89 is a true and correct copy of Social Investigation Report documents as to Jaradat that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00628 to Shatsky-JD00631, together with a certified translation of such records from Arabic into English. Jaradat’s Social Investigation Report reflects that:

- a. On October 4, 2003, Jaradat “[b]ecame a martyr as a result of a heroic martyrdom operation in the city of Haifa, when she blew herself up inside a restaurant.” *See* Ex. 89 at Shatsky-JD00629.
- b. The “Decision of the establishment’s director” recommended that Jaradat “be confirmed as a martyr of the Al-Aqsa Intifada.” *See* Ex. 89 at Shatsky-JD00631.

c. Jaradat's mother is listed as "Rahma Sadeq Sa'id Jaradat" (Identification No. "Redacted 2647"). *See* Ex. 89 at Shatsky-JD00629.

193. Attached as Exhibit 90 are true and correct copies of Martyr Payment Records as to Jaradat that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00199 to Shatsky-JD00203, together with a certified translation of such records from Arabic into English.

194. Jaradat's Martyr Payment Records reflect that the "Case Type" is "Martyr," and that Defendants made monthly payments to her mother "Rahma Sadeq Sa'id Jaradat" (Identification No. "Redacted 2647") between May 2020 and April 2021 totaling 16,800 shekels. Ex. 90 at Shatsky-JD00199, Shatsky-JD00203.

195. ***Jamil Khalaf Mustafa Hamed.*** On March 31, 2002, Netanel Fenichel was driving with his parents in Efrat when a suicide terrorist detonated an explosive device as the car was driving past him. *See Suicide Terrorists in the Current Conflict*, ISRAELI SECURITY AGENCY at 11 (a copy of the relevant sections of the translated report is attached as Exhibit 44); Declaration of Itzhak Ilan 1–3, *Shatsky v. Syrian Arab Republic*, No. 08-cv-0496 (RJL) (D.D.C. Sept. 15, 2020), ECF No. 50-1.

196. As a result of the attack, the following U.S. citizens were injured: Netanel Fenichel, Deborah Fenichel, Ilanit Fenichel, and Moshe Fenichel. Based on their injuries, the above-named victims brought a federal action under 18 U.S.C. § 2333 and other statutes against Arab Bank, PLC. *See* Second Amended Complaint at 3, 15–16, *Little v. Arab Bank, PLC*, No. 04-cv-5449 (NG) (VVP) (E.D.N.Y. Apr. 10, 2007), ECF No. 307. The complaint, signed by attorney Mark S. Werbner of Sayles Werbner P.C., states that the above-named victims were U.S. citizens. *See id.* at 15–16, 107.

197. “Jamil Khalaf Mustafa Hamed” (“Mustafa Hamed”) died perpetrating the attack.

See Spitzen Decl. ¶ 61.

198. Attached as Exhibit 91 is a true and correct copy of Social Investigation Report documents as to Mustafa Hamed that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD01015 to Shatsky-JD01019, together with a certified translation of such records from Arabic into English. Mustafa Hamed’s Social Investigation Report reflects that:

- a. On March 31, 2002, Mustafa Hamed “was martyred upon executing a martyrdom operation in the settlement of Efrat near Bethlehem, which caused his immediate martyrdom.” *See* Ex. 91 at Shatsky-JD01017.
- b. The “Decision of the establishment’s director” states that Mustafa Hamed “is to be confirmed as a martyr of the Al-Aqsa Intifada,” and the “Confirmation of the director general” states that Mustafa Hamed is “to be confirmed as a martyr of the Al-Aqsa Intifada,” and “paid [Redacted].” *See* Ex. 91 at Shatsky-JD01019.
- c. Mustafa Hamed’s “beneficiary” is listed as his father “Khalaf Mustafa Salama Hamed” (Identification No. “^{Redacted}0710”). *See* Ex. 91 at Shatsky-JD01017-18.

199. Attached as Exhibit 92 are true and correct copies of Martyr Payment Records as to Mustafa Hamed produced by Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00128 to Shatsky-JD00132, together with a certified translation of such records from Arabic into English.

200. Mustafa Hamed’s Martyr Payment Records reflect that the “Case Type” is “Martyr,” and that Defendants made monthly payments to his father “Khalaf Mustafa Salama

Hamed" (Identification No. "Redacted 0710") between May 2020 and April 2021 totaling 16,800 shekels. Ex. 92 at Shatsky-JD00128, Shatsky-JD00132.

201. ***Khaled Mohammad Mahmoud al-Khatib.*** On April 9, 1995, "[a]t or about 12:05 p.m. local time, near Kfar Darom in the Gaza Strip, a suicide bomber drove a van loaded with explosives in the number 36 Egged bus, causing an explosion that destroyed the bus." *Haim v. Islamic Republic of Iran*, 425 F. Supp. 2d 56, 60 (D.D.C. 2006) (quoting and taking judicial notice of *Flatow v. Islamic Republic of Iran*, 999 F. Supp. 1, 9 ¶ 6 (D.D.C. 1998)).

202. The bombing killed U.S. citizen Alisa Flatow and injured U.S. citizen Seth Klein Ben-Haim. *See Haim*, 425 F. Supp. 2d at 60–61; *Flatow*, 999 F. Supp. 1 at 7. *See also* Exhibit 93 (Affidavit of Seth Charles Klein [Ben Haim] dated May 14, 2004 filed in *Haim v. Islamic Republic of Iran*, No. 02-cv-01811 (RCL) (D.D.C. Jan. 3, 2006) (ECF No. 24-3)) ¶¶ 1, 8-20, 35 (stating "I was born on October 9, 1975 in Miami, Florida," describing the April 9, 1995 terrorist attack, and his resulting injuries).

203. "Khaled Mohammad Mahmoud al-Khatib" ("al-Khatib") died perpetrating the attack. *See* Spitzer Decl. ¶ 61.

204. Attached as Exhibit 94 is a true and correct copy of Social Investigation Report documents as to al-Khatib that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00812 to Shatsky-JD00817, together with a certified translation of such records from Arabic into English. Al-Khatib's Social Investigation Report reflects that:

- a. On April 9, 1995, al-Khatib "executed a martyrdom operation. He drove a car bomb and rammed into a bus carrying Israeli soldiers near Kfar Darom Junction.

Eleven Israeli soldiers were killed in the operation and more than 20 were injured.

He was martyred.” *See* Ex. 94 at Shatsky-JD00814.

b. The “Decision of the establishment’s director” states that al-Khatib “caused the death of many Israeli soldiers and injured dozens more,” and confirmed him “as an unmarried martyr.” The “Confirmation of the director general” states that al-Khatib “is to be confirmed as a martyr of the homeland.” *See* Ex. 94 at Shatsky-JD00816.

c. Al-Khatib’s sister’s name is listed as “Sabah.” *See* Ex. 94 at Shatsky-JD00815.

205. Attached as Exhibit 95 are true and correct copies of Martyr Payment Records as to al-Khatib that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00032 to Shatsky-JD00036, together with a certified translation of such records from Arabic into English.

206. Al-Khatib’s Martyr Payment Records reflect that the “Case Type” is “Martyr,” and that Defendants made monthly payments to his sister “Sabah Mohammad Mahmoud al-Khatib” between May 2020 and April 2021, totaling 16,800 shekels. *See* Ex. 95 at Shatsky-JD00032, Shatsky-JD00036.

207. ***Magdi Mohammad Abu Wardah.*** U.S. citizens Matthew Eisenfeld, Sara Duker, and Ira William Weinstein were killed when, on February 25, 1996, a suicide terrorist “detonated explosives which, at the direction of Hamas, he had carried on the bus concealed in a travel bag, resulting in the complete destruction of the bus and hurling debris in excess of 100 meters.”

Eisenfeld v. Islamic Republic of Iran, 172 F. Supp. 2d 1, 4 (D.D.C. 2000), *see Weinstein v. Islamic Republic of Iran*, 184 F. Supp. 2d 13, 15 (D.D.C. 2002). *See also* Exhibit 68 (*Foreign Operations, Export Financing, and Related Programs Appropriations for Fiscal Year 2000*, S.

Comm. On Appropriations, 106th Cong. 58 (1999) at 58 (statement of Mark M. Richard, U.S. Assistant Attorney General) (noting “[t]he terrorist attacks that killed American citizens in Israel” include an attack that killed “Matthew Eisenfeld,” “Sara Duker,” and “Ira Weinstein” on “February 25, 1996”)). This declaration refers to the attack as the “February 25, 1996 Attack.”

208. American Leah Stein Mousa was also injured in the February 25, 1996 Attack.

See Mousa v. Islamic Republic of Iran, 238 F. Supp. 2d 1, 3-5 (D.D.C. 2001).

209. “Magdi Mohammad Abu Wardah” (“Magdi Wardah”) died perpetrating the February 25, 1996 Attack. *See* Spitzen Decl. ¶ 61.

210. Attached as Exhibit 96 is a true and correct copy of Social Investigation Report documents as to Magdi Wardah that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00825 to Shatsky-JD00828, together with a certified translation of such records from Arabic into English. Magdi Wardah’s Social Investigation Report reflects that:

- a. Magdi Wardah “was martyred following a suicide explosion attack in an Israeli bus in Jaffa Street in Jerusalem, which caused his martyrdom” on February 25, 1996. *See* Ex. 96 at Shatsky-JD00826.
- b. The “Decision of the establishment’s director” was that Magdi Wardah “is to be confirmed as a martyr,” and the “Confirmation of the director general” confirmed Magdi Wardah was “confirmed as a martyr,” and is to “be paid [Redacted] shekels a month.” *See* Ex. 96 at Shatsky-JD00828.
- c. Magdi Wardah’s “beneficiary” is listed as his mother “Intisar Shihada Abd al-Muhsin Abu Wardah” (Identification No. “^{Redacted} 4344”). *See* Ex. 96 at Shatsky-JD00826.

211. Attached as Exhibit 97 are true and correct copies of Martyr Payment Records as to Magdi Wardah that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00042 to Shatsky-JD00046, together with a certified translation of such records from Arabic into English.

212. Magdi Wardah's Martyr Payment Records reflect that the "Case Type" is "Martyr," and that Defendants made monthly payments to Magdi Wardah's mother and beneficiary "Intisar Shihada Abd al-Muhsin Abu Wardah" (Identification No. ^{«Redacted} 4344) between May 2020 and April 2021 totaling 16,800 shekels. Ex. 97 at Shatsky-JD00042, Shatsky-JD00046.

213. ***Mahmoud Omran Al-Qawasmeh.*** The following U.S. citizens received a judgment in the United States District Court for the Eastern District of New York under 18 U.S.C. § 2333 for injuries caused by an attack on March 5, 2003 in Haifa: Abigail Little, Philip Little, Heidi Little, Elishua Little, Hannah Little, Josiah Little, Noah Little. *See* Stipulation to Enter Final Judgment, *Linde v. Arab Bank*, No. 06-cv-1623 (BMC) (PK) (E.D.N.Y. May 24, 2016), ECF No. 1098. *See also* Second Amended Complaint at 5-8, *Little v. Arab Bank, PLC*, No. 04-cv-5449 (NG) (VVP) (E.D.N.Y. Apr. 10, 2007), ECF No. 307. This declaration refers to the attack as the "March 5, 2003 Attack."

214. "Mahmoud Omran Al-Qawasmeh" died perpetrating the March 5, 2003 Attack. *See* Spitzer Decl. ¶ 61.

215. Attached as Exhibit 98 is a true and correct copy of Social Investigation Report documents as to "Mahmoud Omran Salim Al-Qawasmeh" ("Mahmoud Al-Qawasmeh") that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00559 to Shatsky-JD00562, together with a certified translation

of such records from Arabic into English. Mahmoud Al-Qawasmeh's Social Investigation Report reflects that:

- a. A "Martyrdom Operation in the city of Haifa (Israeli bus) which caused the death of several Israelis and injured many of them" on March 5, 2003. Mahmoud Al-Qawasmeh, "[t]he perpetrator of the operation had been martyred." *See* Ex. 98 at Shatsky-JD00560, Shatsky-JD00562.
- b. The "Confirmation of the director general" states Mahmoud al-Qawasmeh was "[c]onfirmed as a martyr," and "[w]ill be paid [redacted] shekels a month." *See* Ex. 98 at Shatsky-JD00562.
- c. Mahmoud Al-Qawasmeh's "beneficiary" is listed as his father "Omran Salim Suleiman Al-Qawasmeh" (Identification No. "^{Redacted}7838"). *See* Ex. 98 at Shatsky-JD00560.

216. Attached as Exhibit 99 are true and correct copies of Martyr Payment Records as to Mahmoud al-Qawasmeh that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00164 to Shatsky-JD00168, together with a certified translation of such records from Arabic into English.

217. Mahmoud al-Qawasmeh's Martyr Payment Records reflect that the "Case Type" is "Martyr," and that Defendants made monthly payments to Mahmoud al-Qawasmeh's father and beneficiary "Omran Salim Suleiman Qawasmeh" (Identification No. "^{Redacted}7838") between May 2020 and April 2021 totaling 16,800 shekels. *See* Ex. 99 at Shatsky-JD00164, Shatsky-JD00168.

218. ***Mohammed Mashoor Mohammad Hashaika.*** The following U.S. citizens received a judgment under 18 U.S.C. § 2333 stemming from injuries inflicted by an attack on

March 21, 2002 in Jerusalem: Alan J. Bauer, Yehonathon Bauer, Binyamin Bauer, Yehuda Bauer, and Daniel Yichye Bauer. *See Sokolow*, 2015 WL 10852003, at *1-2. This declaration refers to the attack as the “March 21, 2002 Attack.”

219. “Mohammed Mashoor Mohammed Hashaika” died perpetrating the March 21, 2002 Attack. *See* Spitzen Decl. ¶ 61.

220. Attached as Exhibit 100 is a true and correct copy of Social Investigation Report documents as to “Mohammad Mashhoor Mohammad Hashaika” (“Hashaika”) that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00991 to Shatsky-JD00994, together with a certified translation of such records from Arabic into English. Hashaika’s Social Investigation Report reflects that:

- a. Hashaika “was martyred during a martyrdom operation in West Jerusalem, which caused many deaths and injuries among the Israelis” on March 21, 2002. *See* Ex. 100 at Shatsky-JD00992.
- b. The “Confirmation of the director general” states Hashaika was “[t]o be confirmed as an Al-Aqsa Martyr,” and “paid [Redacted] shekels a month.” *See* Ex. 100 at Shatsky-JD00994.
- c. Hashaiki’s “beneficiary” is listed as his mother “Hanan Rabah Abd Al-Rahim Hashaika” (Identification No. “^{Redacted}3068”). *See* Ex. 100 at Shatsky-JD00992-93.

221. Attached as Exhibit 101 are true and correct copies of Martyr Payment Records as to Hashaika that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00118 to Shatsky-JD00122, together with a certified translation of such records from Arabic into English.

222. Hashaika's Martyr Payment Records reflect that the "Case Type" is "Martyr," and that Defendants made monthly payments to Hashaika's mother and beneficiary "Hanan Rabah Abd Al-Rahim Hashaika" (Identification No. "^{Redacted}3068") between May 2020 and April 2021 totaling 16,800 shekels. *See* Ex. 101 at Shatsky-JD00118, Shatsky-JD00122.

223. ***Mohammad Naser Mahmoud Tarayreh***. On June 30, 2016, a terrorist broke into a home in Kiryat Arba near Hebron and killed thirteen-year-old Hallal Yaffa Ariel with a knife as she slept. The U.S. Department of Justice's OVT confirmed that a U.S. citizen was a victim of the attack. *See DOJ/OVT Interactive World Map - Near East*, Justice.gov, <https://www.justice.gov/nsd-ovt/dojovt-interactive-world-map/near-east> (last visited Sept. 21, 2021) (attached as Exhibit 49). *See also* Exhibit 102 (*Palestinian kills teen in Israeli settlement, then shot dead*, Reuters (June 30, 2016)) (reporting a Palestinian fatally stabbed a 13-year-old Israeli girl); Exhibit 103 (*Jewish girl, 13, stabbed to death in West Bank bedroom was U.S. citizen*, Fox News (July 6, 2017)) (reporting Hallel Yaffa Ariel, stabbed to death by Mohammed Tarayreh, was a U.S. citizen, as confirmed by U.S. State Department spokesperson).

224. "Mohammad Naser Mahmoud Tarayreh" ("Tarayreh") died perpetrating the attack. *See* Spitzen Decl. ¶ 61. *See also* Ex. 103.

225. Attached as Exhibit 104 is a true and correct copy of Social Investigation Report documents as to Tarayreh that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00725 to Shatsky-JD00728, together with a certified translation of such records from Arabic into English. Tarayreh's Social Investigation Report reflects that:

- a. Tarayreh was killed after "stabbing an Israeli" on June 30, 2016 in the "Kiryat Arba settlement." *See* Ex. 104 at Shatsky-JD00726.

- b. The “Decision of the establishment’s director” states “[t]he martyr is confirmed,” and the “Confirmation of the director general” states Tarayreh “is confirmed an Al-Aqsa martyr,” and “will be paid [redacted] a month.” *See* Ex. 104 at Shatsky-JD00727.
- c. Tarayreh’s “beneficiary” is listed as his father “Naser Mahmoud Khalil Tarayreh” (Identification No. “^{Redacted} 2913”). *See* Ex. 104 at Shatsky-JD00726.

226. Attached as Exhibit 105 are true and correct copies of Martyr Payment Records as to Tarayreh that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00241 to Shatsky-JD00244, together with a certified translation of such records from Arabic into English.

227. Tarayreh’s Martyr Payment Records reflect that the “Case Type” is “Martyr,” and that Defendants made monthly payments to his father and beneficiary “Naser Mahmoud Khalil Tarayreh” (Identification No. “^{Redacted} 2913”) between May 2020 and April 2021 totaling 16,800 shekels. *See* Ex. 105 at Shatsky-JD00241, Shatsky-JD00243-44.

228. ***Muawiya Mohammad Ahmed Jarara.*** With regard to an attack on July 30, 1997 in Mahane Yehuda Market in Jerusalem, the U.S. District Court for the District of Columbia made the following findings of fact:

On Friday, July 30, 1997, two suicide bombers belonging to the Hamas terrorist organization and acting on behalf of Hamas entered the Mahane Yehuda outdoor produce market in downtown Jerusalem, which was crowded with Sabbath-eve shoppers. Each of the bombers carried a briefcase packed with a powerful explosive charge. At a pre-arranged signal, the bombers triggered their explosives. The blasts ripped through the crowded market, killing 15 shoppers, including decedent Leah Stern, and wounding another 168 (hereinafter “the bombing attack”). In a press release, Hamas claimed responsibility for the bombing attack.

... As a result of the explosion, [U.S. citizen] Leah Stern suffered horrendous injuries. The explosion caused Leah Stern severe burns, and much of the skin on her face was ripped off by the blast. Leah Stern suffered multiple and diffuse lacerations over the

facial area, thorax, abdomen and limbs. Several pieces of shrapnel, specifically nails, lodged in her chin, right breast, right arm, both knees and left thigh. Leah Stern also suffered a gaping abdominal wound which exposed her intestines. Her left leg was covered with burns and lacerations from the explosion, and bones in the lower leg were broken. Leah Stern's right leg was partially severed at the knee, and shrapnel lodged in the remaining portion of her leg.

. . . Leah Stern expired from her wounds on the scene on July 30, 1997.

Stern v. Islamic Republic of Iran, 271 F. Supp. 2d 286, 289 (D.D.C. 2003) (internal citations omitted). Joseph Stern, Yocheved Kushner, Shimson Stern, and Shaul Stern are Leah Stern's children, are U.S. citizens, and were also injured by the attack. *See id.* at 289-90.

229. “Muawiya Mohammad Ahmed Jarara” died perpetrating the attack. *See* Spitzen Decl. ¶ 61.

230. Attached as Exhibit 106 is a true and correct copy of Social Investigation Report documents as to “Mu’awiya Muhammad Ahmad Jarari’a” (“Jarari’a”) that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00844 to Shatsky-JD00847, together with a certified translation of such records from Arabic into English. Jarari’a’s Social Investigation Report reflects that:

- a. Jarari’a “was martyred as a result of his martyrdom operation at Mahne Yehuda Market in Jerusalem, which caused the death of 16 Jews and injured many.” *See* Ex. 106 at Shatsky-JD00845.
- b. The “Decision of the establishment’s director” states Jarari’a “was martyred when he executed a martyrdom operation in Jerusalem on 7.30.97,” and the “Confirmation of the director general” states Jarari’a “is to be confirmed as martyr,” and “be paid 688 shekels a month.” *See* Ex. 106 at Shatsky-JD00847.
- c. Jarari’a’s mother is listed as “Nahla Mahmoud Fares Jarari’a” (Identification No. ^{“Redacted”} 7621”). *See* Ex. 106 at Shatsky-JD00845-46.

231. Attached as Exhibit 107 are true and correct copies of Martyr Payment Records as to Jarari'a that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00052 to Shatsky-JD00056, together with a certified translation of such records from Arabic into English.

232. Jarari'a's Martyr Payment Records reflect that the "Case Type" is "Martyr," and that Defendants made monthly payments to Jarari'a's mother "Nahla Mahmoud Fares Jarari'a" (Identification No. "^{Redacted}7621") between May 2020 and April 2021 totaling 16,800 shekels. *See* Ex. 107 at Shatsky-JD00052, Shatsky-JD00056.

233. ***Muhammed Kzid Faysal Bastami***. On October 27, 2002, a suicide terrorist committed an attack near Ariel. As a result of the attack, the following U.S. citizens were injured: Yitzhak Zahavy, Julie Zahavy, Tzvee Zahavy, Bernice Zahavy. *See* Ex. 108 (Declaration of Yitzhak Zahavy dated Nov. 10, 2020 filed in *Sokolow v. Palestine Liberation Org.*, No. 04-cv-00397 (GBD) (S.D.N.Y. Nov. 12, 2020) (ECF No. 1018-23)) (stating he has been "a citizen of the United State since birth," was "severely injured" in the October 27, 2002 terrorist attack, and that the attack caused severe emotional distress to his family members).

234. "Muhammed Kzid Faysal Bastami" died perpetrating the attack. *See* Spitzen Decl. ¶ 61.

235. Attached as Exhibit 109 is a true and correct copy of Social Investigation Report documents as to "Muhammad Kzid Faysal Bastami" ("Bastami") that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD01078 to Shatsky-JD01081, together with a certified translation of such records from Arabic into English. Bastami's Social Investigation Report reflects that:

- a. Bastami “was martyred” on October 27, 2002 “when he executed a martyrdom operation in the Settlement of Ariel, which caused the death of several [soldiers] in the Israeli army, including Captain Tamir Masad, a high-ranking Israeli officer. A few people were severely injured.” *See* Ex. 109 at Shatsky-JD01079.
- b. The “Decision of the establishment’s director” states Bastami “was martyred on 10.27.2002 during the execution of a martyrdom operation in the Settlement of Ariel,” and the “Confirmation of the director general” states Bastami is “[t]o be confirmed an A-Aqsa Martyr” and “paid [Redacted].” *See* Ex. 109 at Shatsky-JD01081.
- c. Bastami’s “beneficiary” is listed as his father “Kzid Faysal Farid Bastami” (Identification No. “^{Redacted} 6955”). *See* Ex. 109 at Shatsky-JD01079-80.

236. Attached as Exhibit 110 are true and correct copies of Martyr Payment Records as to Bastami that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00149 to Shatsky-JD00153, together with a certified translation of such records from Arabic into English.

237. Bastami’s Martyr Payment Records reflect that the “Case Type” is “Martyr,” and that Defendants made monthly payments to his father and beneficiary “Kazid Faysal Farid Bastami” (Identification No. “^{Redacted} 6955”) between May 2020 and April 2021 totaling 16,800 shekels. Ex. 110 at Shatsky-JD00149, Shatsky-JD00153.

238. ***Nabil Mahmoud Al-Halabiah and Osama Mohammed Bahr.*** On December 1, 2001, a suicide bombing on Ben Yehuda Street in Jerusalem resulted in the deaths of 10 people and injury to 120 others. *See Kirschenbaum v. Islamic Republic of Iran*, 572 F. Supp. 2d 200, 205-06 (D.D.C. 2008).

239. The following U.S. citizens were injured by the attack: Jason Kirschenbaum, Isabelle Kirschenbaum, Martin Kirschenbaum, Joshua Kirschenbaum, David Kirschenbaum, and Danielle Teitlebaum. *See Kirschenbaum*, 572 F. Supp. 2d at 204-05. *See also* Ex. 111 (Affidavit of Martin Kirschenbaum dated March 6, 2008 filed in *Kirschenbaum v. Islamic Republic of Iran*, No. 03-cv-01708 (RCL) (D.D.C. Mar. 13, 2008) (ECF No. 29-1)) (stating “I became a citizen of the United States on December 17, 1962” and attaching Certificate of Naturalization).

240. Additional individuals filed an action under 18 U.S.C. § 2333 as U.S. nationals injured by this attack. *See Strauss v. Crédit Lyonnais, S.A.*, 925 F. Supp. 2d 414, 418 (E.D.N.Y. 2013); Complaint ¶¶ 308-359, *Strauss*, 925 F. Supp. 2d 414, No. 1:06-cv-00702-DLI-RML (E.D.N.Y. Feb. 16, 2006), ECF No. 1.

241. Two suicide terrorists died perpetrating the attack: “Nabil Mahmoud Al-Halabiah” and “Osama Mohammed Bahr.” *See* Spitzen Decl. ¶ 61.

242. Attached as Exhibit 112 is a true and correct copy of Social Investigation Report documents as to “Nabil Mahmoud Jamil Halabiah” (“Halabiah”) that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00914 to Shatsky-JD00916 and Shatsky-JD02067 together with a certified translation of such records from Arabic into English. Halabiah’s Social Investigation Report reflects that:

- a. Halabiah died “[a]s a result of a martyrdom operation on 12.1.2001 at 02:00 AM. He executed the first operation, which was followed by the second operation by his colleague Usama Bahr in West Jerusalem.” *See* Ex. 112 at Shatsky-JD00914.
- b. The “Decision of the establishment’s director” recommended “to confirm him as a martyr,” and the “Confirmation of the director general” states Halabiah is “[t]o

be confirmed as a martyr of Al-Aqsa” and “paid [Redacted].” *See* Ex. 112 at Shatsky-JD00916.

c. Halabiah’s “beneficiary” is listed as his mother “Fatma Ali Hussein Halabiah” (Identification No. “^{Redacted} 5335”). *See* Ex. 112 at Shatsky-JD00914.

243. Attached as Exhibit 113 are true and correct copies of Martyr Payment Records as to Halabiah that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00088 to Shatsky-JD00092, together with a certified translation of such records from Arabic into English.

244. Halabiah’s Martyr Payment Records reflect that the “Case Type” is “Martyr,” and that Defendants made monthly payments to Halabiah’s mother and beneficiary “Fatma Ali Hussein Halabiah” (Identification No. “^{Redacted} 5335”) between May 2020 and April 2021 totaling 16,800 shekels. *See* Ex. 113 at Shatsky-JD00088, Shatsky-JD00092.

245. Attached as Exhibit 114 is a true and correct copy of Social Investigation Report documents as to “Osama Mohammed Abd Bahr” (“Bahr”) that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00920 to Shatsky-JD00923, together with a certified translation of such records from Arabic into English. Bahr’s Social Investigation Report reflects that:

- a. Bahr died in “a martyrdom operation on the night of 12.1.2001 in Jerusalem, Jaffa Street.” *See* Ex. 114 at Shatsky-JD00921.
- b. The “Decision of the establishment’s director” recommended “to confirm him as an Al-Aqsa Martyr,” and the “Confirmation of the director general” states Bahr is “[t]o be confirmed as an Al-Aqsa Martyr” and “paid [redacted] shekels a month.” *See* Ex. 114 at Shatsky-JD00923.

c. Bahr's father's name is listed as "Mohammed Abd Hussein Bahr." *See* Ex. 114 at Shatsky-JD00921-22.

246. Attached as Exhibit 115 are true and correct copies of Martyr Payment Records as to Bahr that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00093 to Shatsky-JD00097, together with a certified translation of such records from Arabic into English.

247. Bahr's Martyr Payment Records reflect that the "Case Type" is "Martyr," and that Defendants made monthly payments to Bahr's father "Muhammad Abd Hussein Bahr" between May 2020 and April 2021 totaling 16,800 shekels. *See* Ex. 115 at Shatsky-JD00093, Shatsky-JD00097.

248. ***Omar Muhammad Awadh Abu al-Rab and Yousef Muhammad Ragheb Abu al-Rab.*** On November 28, 2002, two Al-Aqsa Martyrs Brigade terrorists entered a polling station in Beit Shean, killing six and wounding more than 20, including Jacky Levi, the husband of U.S. citizen Bat Zion Levi. Based on her injuries, Bat Zion Levi brought a federal action under 18 U.S.C. § 2333 and other statutes against Chevron Corporation and other defendants. *See* Second Amended Complaint at 17, 19, *Almog v. Arab Bank, PLC*, No. 04-cv-5564 (BMC) (PK) (E.D.N.Y. Apr. 20, 2015), ECF No. 1250. The complaint, signed by attorney John M. Eubanks of Motley Rice LLC, states that Levi was a U.S. citizen. *See id.* at 17, 20.

249. "Omar Muhammad Awadh Abu al-Rab" and "Yousef Muhammad Ragheb Abu al-Rab" died perpetrating the attack. *See* Spitzen Decl. ¶ 61.

250. Attached as Exhibit 116 is a true and correct copy of Social Investigation Report documents as to "Omar Muhammad Awadh Abu al-Rub" ("Omar al-Rub") that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers

Shatsky-JD01087 to Shatsky-JD01089, and a certified translation of such records from Arabic into English. Omar al-Rub's Social Investigation Report reflects that:

- a. On November 28, 2002, Omar al-Rub "was martyred during a heroic martyrdom operation in [cut off] His colleague Yousef Abu al-Rub and him opened fire at an Israeli elections center of the Likud Party on 11.28.2002." *See* Ex. 116 at Shatsky-JD01089.
- b. Omar al-Rub's "beneficiary" is listed as his father "Muhammad Awadh Ali Abu al-Rub" (Identification No. "^{Redacted} 6033"). *See* Ex. 116 at Shatsky-JD01088-89.

251. Attached as Exhibit 117 are true and correct copies of Martyr Payment Records as to Omar al-Rub that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00154 to Shatsky-JD00158, together with a certified translation of such records from Arabic into English.

252. Omar al-Rub's Martyr Payment Records reflect that the "Case Type" is "Martyr," and that Defendants made monthly payments to Omar al-Rub's father and beneficiary "Muhammad Awd Ali Abu A-Rub" (Identification No. "^{Redacted} 6033") between May 2020 and April 2021 totaling 16,800 shekels. Ex. 117 at Shatsky-JD00154, Shatsky-JD00158.

253. Attached as Exhibit 118 is a true and correct copy of Social Investigation Report documents as to "Yousef Muhammad Ragheb Abu al-Rub" ("Yousef al-Rub") that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD01096 to Shatsky-JD01098 and Shatsky-JD001101, together with a certified translation of such records from Arabic into English. Yousef al-Rub's Social Investigation Report reflects that:

- a. On November 28, 2002 Yousef al-Rub “was martyred having executed a martyrdom operation in Beit She’an. Along with his partner, [Illegible] Muhammad Abu al-Rub, he opened fire at a group of Israelis. As a result, his partner and him were martyred, having killed many Israelis.” *See* Ex. 118 at Shatsky-JD01101.
- b. The “Decision of the establishment’s director” recommended “to confirm the martyr as a martyr of the Al-Aqsa Intifada as of 12.1.2002 ...” *See* Ex. 118 at Shatsky-JD01097.
- c. Yousef al-Rub’s sister’s name is listed as “Butheina Muhammad Ragheb Abu al-Rub.” *See* Ex. 118 at Shatsky-JD01098.

254. Attached as Exhibit 119 are true and correct copies of Martyr Payment Records as to Yousef al-Rub that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00159 to Shatsky-JD00163, and a certified translation of such records from Arabic into English.

255. Yousef al-Rub’s Martyr Payment Records reflect that the “Case Type” is “Military martyr,” and that Defendants made monthly payments to Yousef al-Rub’s sister “Butheina Muhammad Ragheb Abu A-Rub” between May 2020 and April 2021 totaling 16,800 shekels. *See* Ex. 119 at Shatsky-JD00159, Shatsky-JD00163.

256. ***Osama Adel Mohammad Beshkar.*** On May 19, 2002, U.S. citizen Gloria Kushner was injured in a market in Netanya when a suicide terrorist blew himself up, killing 3 and injuring 60. *See Suicide Terrorists in the Current Conflict*, ISRAELI SECURITY AGENCY at 9 (a copy of the relevant sections of the translated report is attached as Exhibit 44); Declaration of

Itzhak Ilan 1–3, *Shatsky v. Syrian Arab Republic*, No. 08-cv-0496 (RJL) (D.D.C. Sept. 15, 2020), ECF No. 50-1.

257. Based on her injuries, Kushner brought a federal action under 18 U.S.C. § 2333 and other statutes against Arab Bank, PLC. *See* First Amended Complaint, *Linde v. Arab Bank, PLC*, No. 04-cv-2799 (NG) (ASC) (E.D.N.Y. Aug. 10, 2004), ECF No. 4. The complaint, signed by attorney David H. Wollmuth of Wollmuth Maher & Deutsch LLP, states that Kushner was a U.S. citizen. *See id.* at 28, 67.

258. “Osama Adel Mohammad Beshkar” died perpetrating the attack. *See* Spitzen Decl. ¶ 61.

259. Attached as Exhibit 120 is a true and correct copy of Social Investigation Report documents as to “Osama Adel Ahmad Beshkar” (“Beshkar”) that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD01024, Shatsky-JD01034, and Shatsky-JD01036 to Shatsky-JD01039, together with a certified translation of such records from Arabic into English. Beshkar’s Social Investigation Report reflects that:

- a. On May 19, 2002 in Netanya, Beshkar “was martyred during the execution of The Umm Khaled Martyrdom Operation inside a commercial market, which caused the death the injury of many Israelis.” *See* Ex. 120 at Shatsky-JD01038.
- b. The “Confirmation of the director general” states Beshkar is to be “confirmed as an Al-Aqsa Martyr” and “paid [Redacted] shekels a month.” *See* Ex. 120 at Shatsky-JD01039.
- c. Beshkar’s “beneficiary” is listed as his mother “Hiyam Mohammed Mas’ud Beshkar” (Identification No. “^{Redacted}1940”), “[t]he allowance is paid to the benefit

of the martyr’s parents,” and the “allowance is divided between the martyr’s parents.” *See* Ex. 120 at Shatsky-JD01024, Shatsky-JD01034, Shatsky-JD01038.

d. Beshkar’s father is listed as “Adel Ahmad Hussein Beshkar.” *See* Ex. 120 at Shatsky-JD01036.

260. Attached as Exhibit 121 are true and correct copies of Martyr Payment Records as to Beshkar that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00133 to Shatsky-JD00138, and a certified translation of such records from Arabic into English.

261. Beshker’s Martyr Payment Records reflect that the “Case Type” is “Martyr,” and that Defendants made monthly payments to Beshkar’s mother and father between May 2020 and April 2021 totaling 16,800 shekels. *See* Ex. 121 at Shatsky-JD00133, Shatsky-JD00138.

262. ***Raed Abdel-Hamid al-Razaq Misk.*** With regard to the attack in Jerusalem on August 19, 2003, the U.S. District Court for the District of Columbia made the following findings of fact:

On August 19, 2003, Ora Cohen and her then-husband Shalom journeyed to the Western Wall, a holy site in Old Jerusalem, for an afternoon of prayer. Their five children—daughter Meirav Cohen (7 years old at the time); son Daniel Cohen (6 years old); daughter Orly Cohen (4 years old); daughter Shira Cohen (1 year old); and newborn son, Elchanan Cohen (1 month old)—accompanied them on this family outing. That evening, the Cohen family boarded the Number 2 Egged Bus to return home. Because the bus was crowded, the family was forced to split up in order to find seating, with Shalom and Shira standing in the middle of the bus apart from the rest of the family, who were seated near the front. A few stops short of their final destination, Ora observed a gentleman force his way onto the bus and remembers the “whole world [going] black.”

[A] Hamas operative [] had boarded the bus in the Shmuel Ha–Navi neighborhood with a bomb strapped to his body. He detonated it almost immediately upon boarding, killing 23 people and injuring 130 more, including every Cohen family member aboard.

Cohen v. Islamic Republic of Iran, 238 F. Supp. 3d 71, 75–76 (D.D.C. 2017) (internal citations omitted). This declaration refers to the attack as the “August 19, 2003 Attack.”

263. Ora Cohen and all of her children are U.S. citizens. *See id.* at 77. *See also* Ex. 122 (Affidavit of Ora Cohen dated August 18, 2016 filed in *Cohen v. Islamic Republic of Iran*, No. 12-cv-01496 (CRC) (D.D.C. Aug. 22, 2016) (ECF No. 39-1)) ¶¶ 2-11 (stating Ora Cohen, along with her children Mirav, Daniel, Orly, Shira, and Elchanan are U.S. citizens and suffered injuries as a result of the August 19, 2003 attack, and attaching proof of citizenship).

264. U.S. citizen Shalom Goldstein was also injured in the August 19, 2003 Attack. *See* Ex. 123 (Declaration of Shalom Goldstein dated December 2, 2018 filed in *Goldstein v. Islamic Republic of Iran*, No. 16-cv-2507 (D.D.C. Dec. 3, 2018) (ECF No. 15-1)) ¶¶ 2-4.

265. “Raed Abdel-Hamid al-Razaq Misk” died perpetrating the August 19, 2003 Attack. *See* Spitzer Decl. ¶ 61.

266. Attached as Exhibit 124 is a true and correct copy of Social Investigation Report documents as to “Raed Abdel-Hamid Abd A-Razaq Misk” (“Misk”) that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00603 to Shatsky-JD00606, together with a certified translation of such records from Arabic into English. Misk’s Social Investigation Report reflects that:

- a. On August 19, 2003, Misk was involved in a “Martyrdom Operation in an Israeli articulated bus in Western Jerusalem.” *See* Ex. 124 at Shatsky-JD00604.
- b. The “Decision of the establishment’s director” states “I instruct to confirm the aforementioned as a martyr of the Al-Aqsa Intifada,” and the “Confirmation of the director general” states Misk is to be “[c]onfirmed as a martyr of the Al-Aqsa Intifada” and “be paid [redacted] shekels a month.” *See* Ex. 124 at Shatsky-JD00606.

c. Misk’s “beneficiary” is listed as his wife “Arij Muhammad Zuheir Muhammad Shafiq Misk” (Identification No. “^{Redacted}0496”). *See* Ex. 124 at Shatsky-JD00604-5.

267. Attached as Exhibit 125 are true and correct copies of Martyr Payment Records as to Misk that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00189 to Shatsky-JD00193, and a certified translation of such records from Arabic into English.

268. Misk’s Martyr Payment Records reflect that the “Case Type” is “Martyr,” and that Defendants made monthly payments to his wife and beneficiary “Arij Muhammad Zuheir Muhammad Shafiq” (Identification No. “^{Redacted}0496”) between May 2020 and April 2021 totaling 28,800 shekels. *See* Ex. 125 at Shatsky-JD00189, Shatsky-JD00193.

269. ***Ramez Abed al-Kader Mohammad Abid.*** On March 4, 1996 in Tel Aviv, Gail Belkin, the wife of U.S. citizen Lawrence Belkin, was killed when “a suicide bomber affiliated with the Shaqaqi faction of the Palestine Islamic Jihad (“PIJ”) detonated a 40-pound bomb that he was carrying just outside the doors of [a] shopping mall . . . [killing] Gail Belkin and her mother, plus eleven others, mostly women and children” and injuring 125 others. *Belkin v. Islamic Republic of Iran*, 667 F. Supp. 2d 8, 12-13 (D.D.C. 2009).

270. “Ramez Abed al-Kader Mohammad Abid” died perpetrating the attack. *See* Spitzen Decl. ¶ 61.

271. Attached as Exhibit 126 is a true and correct copy of Social Investigation Report documents as to “Ramez Abd al-Qader Muhammad Ubeid” (“Ubeid”) that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-

JD00835 to Shatsky-JD00840, together with a certified translation of such records from Arabic into English. Ubeid's Social Investigation Report reflects that:

- a. On March 4, 1996, Ubeid was involved in a "Martyrdom operation in Tel Aviv." *See* Ex. 126 at Shatsky-JD00837.
- b. The "Decision of the establishment's director" states "[a]ccording to the decision of the honorable minister, he is to be confirmed as a martyr of the homeland," and "Monthly allowance – [Redacted] shekels." *See* Ex. 126 at Shatsky-JD00839.
- c. Ubeid's sister is listed as "Aida." *See* Ex. 126 at Shatsky-JD00838.

272. Attached as Exhibit 127 are true and correct copies of Martyr Payment Records as to Ubeid that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00047 to Shatsky-JD00051, and a certified translation of such records from Arabic into English.

273. Ubeid's Martyr Payment Records reflect that the "Case Type" is "Martyr," and that Defendants made monthly payments to his sister "Aida" between May 2020 and April 2021 totaling 16,800 shekels. *See* Ex. 127 at Shatsky-JD00047, Shatsky-JD00051.

274. ***Said Hussein Hasan Hutari.*** On June 1, 2001, a Hamas operative and suicide terrorist detonated himself near a group of people at the entrance to the "Water World" club in the Tel Aviv Dolphinarium, killing 22 and injuring 83 others. *See Suicide Terrorists in the Current Conflict*, ISRAELI SECURITY AGENCY at 15 (a copy of the relevant sections of the translated report is attached as Ex. 44); Declaration of Itzhak Ilan 1–3, *Shatsky v. Syrian Arab Republic*, No. 08-cv-0496 (RJL) (D.D.C. Sept. 15, 2020), ECF No. 50-1. This declaration refers to the attack as the "June 1, 2001 Attack."

275. A U.S. national was killed or injured in the June 1, 2001 Attack, according to the U.S. Department of Justice's OVT. *See DOJ/OVT Interactive World Map - Near East*, Justice.gov, <https://www.justice.gov/nsd-ovt/dojovt-interactive-world-map/near-east> (last visited Sept. 21, 2021) a copy of which is attached as Exhibit 49.

276. “Said Hussein Hasan Hutari” died perpetrating the June 1, 2001 Attack. *See* Spitzer Decl. ¶ 61.

277. Attached as Exhibit 128 is a true and correct copy of Social Investigation Report documents as to “Sa’id Hasan Hussein Hutari” (“Hutari”) that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00885 to Shatsky-JD00889, together with a certified translation of such records from Arabic into English. Hutari’s Social Investigation Report reflects that:

- a. On June 1, 2001, Hutari was martyred “[d]uring a martyrdom operation in Tel Aviv.” *See* Ex. 128 at Shatsky-JD00886.
- b. The “Confirmation of the director general” states Hutari “is to be confirmed as a martyr of the Al-Aqsa Martyrs,” and “paid [Redacted] shekels a month.” *See* Ex. 128 at Shatsky-JD00888.
- c. Hutari’s “beneficiary” is listed as “Hasan Hussein Hasan Hutari” (Identification No. “^{Redacted}3842”). Hutari’s father’s name is listed as “Hasan.” *See* Ex. 128 at Shatsky-JD00886-87.

278. Attached as Exhibit 129 are true and correct copies of Martyr Payment Records as to Hutari that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00078 to Shatsky-JD00082, and a certified translation of such records from Arabic into English.

279. Hutari's Martyr Payment Records reflect that the "Case Type" is "Martyr," and that Defendants made monthly payments to Hutari's beneficiary and father "Hasan Hussein Hasan Hutari" (Identification No. ^{“Redacted”} 3842") between May 2020 and April 2021 totaling 16,800 shekels. *See* Ex. 129 at Shatsky-JD00078, Shatsky-JD00082.

280. ***Said Ibrahim Said Ramadan.*** The following U.S. citizens received a judgment under 18 U.S.C. § 2333 stemming from injuries inflicted by an attack on January 22, 2002 in Jerusalem (Jaffa Road): Shayna Gould, Ronald Gould, Elise Gould, Jessica Gould Rine, Shmuel Waldman, Henna Waldman, Morris Waldman. *See Sokolow*, 2015 WL 10852003, at *1. This declaration refers to the attack as the "January 22, 2002 Attack."

281. "Said Ibrahim Said Ramadan" ("Ramadan") died perpetrating the January 22, 2002 Attack. *See* Spitzen Decl. ¶ 61.

282. Attached as Exhibit 130 is a true and correct copy of Social Investigation Report documents as to Ramadan that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00959 to Shatsky-JD00965, together with a certified translation of such records from Arabic into English. Ramadan's Social Investigation Report reflects that:

- a. Ramadan was "martyred" on January 22, 2002 "while executing a martyrdom operation in West Jerusalem. The operation caused the death and injury of many Israelis." *See* Ex. 130 at Shatsky-JD00961.
- b. The "Decision of the establishment's director" states that Ramadan is "[t]o be confirmed as an Al-Aqsa Martyr," and the "Confirmation of the director general" states that Ramadan is "[t]o be confirmed as an Al-Aqsa Martyr." *See* Ex. 130 at Shatsky-JD00963-64.

- c. Ramadan's mother's name is listed as "Aziya Ali Ibrahim Ramadan." *See* Ex. 130 at Shatsky-JD00961-62.
- d. In June of 2009, the Establishment's director confirmed that Ramadan's "allowance" was "confirmed for disbursement," and listed Ramadan's "beneficiary" as "Aziya Ali Ibrahim Ramadan" (Identification No. ^{Redacted}0137"). *See* Ex. 130 at Shatsky-JD00965.

283. Attached as Exhibit 131 are true and correct copies of Martyr Payment Records as to Ramadan that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00108 to Shatsky-JD00112, together with a certified translation of such records from Arabic into English.

284. Ramadan's Martyr Payment Records reflect that his "Case Type" is "Military martyr," and that Defendants made monthly payments to Ramadan's mother and beneficiary "Aziya Ali Ibrahim Ramadan" (Identification No. ^{Redacted}0137") between May 2020 and April 2021 totaling 18,720 shekels. *See* Ex. 131 at Shatsky-JD00108, Shatsky-JD00112.

285. ***Sa'id Wadah Hamid Awada.*** U.S. citizen Leonard Mandelkorn received a judgment in a case under 18 U.S.C. § 2333 stemming from injuries caused by an attack in Jerusalem on June 19, 2002. *See* Sokolow, 2015 WL 10852003, at *2.

286. "Sa'id Wadah Hamid Awada" was killed while perpetrating the attack. *See* Spitzen Decl. ¶ 61.

287. Attached as Exhibit 132 is a true and correct copy of Social Investigation Report documents as to "Sa'id Widah Hamid Awada" ("Sa'id Awada") that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-

JD01051 to Shatsky-JD01053 and Shatsky-JD02068, and a certified translation of such records from Arabic into English. Sa'id Awada's Social Investigation Report reflects that:

- a. Sa'id Awada "was martyred when he executed a martyrdom operation in Jerusalem which caused the death and injury of many Zionists" on June 18, 2002. *See* Ex. 132 at Shatsky-JD01052.
- b. The "Confirmation of the director general" states that Sa'id Awada is "[t]o be confirmed an Al-Aqsa Martyr" and "paid [Redacted]." *See* Ex. 132 at Shatsky-JD01053.
- c. Sa'id Awada's "beneficiary" is listed as his mother "Shadiya Barkat Abd A-Rahim Awada" (Identification No. "^{Redacted}7977"). *See* Ex. 132 at Shatsky-JD01052.

288. Attached as Exhibit 133 are true and correct copies of Martyr Payment Records as to Sa'id Awada that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00139 to Shatsky-JD00143, together with a certified translation of such records from Arabic into English.

289. Sa'id Awada's Martyr Payment Records reflect that the "Case Type" is "Martyr," and that Defendants made monthly payments to Sa'id Awada's mother and beneficiary "Shadiya Barkat Abd A-Rahim Awada" (Identification No. "^{Redacted}7977") between May 2020 and April 2021 totaling 16,800 shekels. *See* Ex. 133 at Shatsky-JD00139, Shatsky-JD00143.

290. ***Samir Samih Mohammad Hammad.*** "[D]uring lunchtime on April 17, 2006, a suicide bomber arrived at the Rosh Ha'ir restaurant in Tel Aviv carrying a powerful explosive device which had been provided to him by the [Palestinian Islamic Jihad]. The explosion killed eleven people and wounded dozens of others. Among the wounded w[as] sixteen-year-old [U.S.]

citizen] Daniel Wultz.” *Wultz v. Islamic Republic of Iran*, 864 F. Supp. 2d 24, 30, 32 (D.D.C. 2012) (internal citations omitted). This declaration refers to the attack as the “April 17, 2006 Attack.”

291. The following U.S. citizens were also injured by the April 17, 2006 Attack: Yekutiel Wultz, Sheryl Wultz, and Amanda Wultz. *Id.* at 32. Daniel died of his injuries. *Id.* at 27.

292. “Samer Samih Mohammad Hammad” (“Samer Samih”) died perpetrating the April 17, 2006 Attack. *See* Spitzen Decl. ¶ 61.

293. Attached as Exhibit 134 is a true and correct copy of Social Investigation Report documents as to Samer Samih that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00673 to Shatsky-JD00676, together with a certified translation of such records from Arabic into English. Samer Samih’s Social Investigation Report reflects that:

- a. Samer Samih “became a martyr during the execution of a martyrdom operation in Tel Aviv” on April 17, 2006. *See* Ex. 134 at Shatsky-JD00674.
- b. The “Decision of the establishment’s director” recommends that Samer Samih “will be confirmed as a martyr of the Al-Aqsa Intifada” and the “Confirmation of the director general” states “[t]he martyr is confirmed as a martyr of the Al-Aqsa Intifada” and Samer Samih is “[t]o be paid 700 Shekels a month from the Establishment to his father.” *See* Ex. 134 at Shatsky-JD00676.
- c. Samer Samih’s “beneficiary” is listed as his father “Samih Mohammad Ahmad Hammad” (Identification No. “^{Redacted} 5135”). *See* Ex. 134 at Shatsky-JD00674-75.

294. Attached as Exhibit 135 are true and correct copies of Martyr Payment Records as to Samer Samih that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00215 to Shatsky-JD00219, together with a certified translation of such records from Arabic into English.

295. Samer Samih's Martyr Payment Records reflect that the "Case Type" is "Martyr," and that Defendants made monthly payments to Samer Samih's father and beneficiary "Samer Mohammad Ahmad Hammad" (Identification No. ^{«Redacted} 5135") between May 2020 and April 2021 totaling 16,800 shekels. *See* Ex. 135 at Shatsky-JD00215, Shatsky-JD00219.

296. ***Sufyan Salem Abd Rabbo al-Jabarin.*** A suicide bombing killed U.S. citizen Joanne Davenny on August 21, 1995, according to Department of Justice testimony reporting on an FBI investigation into her death. *See* Exhibit 68 (*Foreign Operations, Export Financing, and Related Programs Appropriations for Fiscal Year 2000*, S. Comm. on Appropriations, 106th Cong. 58 (1999) at 58 (statement of Mark M. Richard, U.S. Assistant Attorney General)).

297. "Sufyan Salem Abd Rabbo al-Jabarin" ("Jabarin") died perpetrating the attack. *See* Spitzen Decl. ¶ 61.

298. Attached as Exhibit 136 is a true and correct copy of Social Investigation Report documents as to Jabarin that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00818 to Shatsky-JD00823, and a certified translation of such records from Arabic into English. Jabarin's Social Investigation Report reflects that:

- a. On August 21, 1995, Jabarin "was martyred as a result of a martyrdom operation he executed against an Israeli bus in Palestine (1948)." *See* Ex. 136 at Shatsky-JD00819.

b. Jabarin “is to be paid a monthly allowance of [Redacted].” *See* Ex. 136 at Shatsky-JD00822.

c. Jabarin’s “beneficiary” is listed as his mother “Sabha Muhammad Mahmoud Subh” (Identification No. “^{Redacted}7928”). *See* Ex. 136 at Shatsky-JD00819.

299. Attached as Exhibit 137 are true and correct copies of Martyr Payment Records as to Jabarin that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00037 to Shatsky-JD00041, together with a certified translation of such records from Arabic into English.

300. Jabarin’s Martyr Payment Records reflect that his “Case Type” is “Martyr,” and that Defendants made monthly payments to his mother and beneficiary “Sabha Muhammad Mahmoud Subh” (Identification No. “^{Redacted}7928”) between May 2020 and April 2021 totaling 16,800 shekels. *See* Ex. 137 at Shatsky-JD00037, Shatsky-JD00041.

301. ***Yusef Ibrahim Hasan Atalla.*** On August 31, 2002, U.S. citizens Jacob and Dalit Rand were walking from synagogue in Har Bracha near Nablus when a suicide terrorist opened fire at them, seriously injuring both. Based on their injuries, these victims brought a federal action under 18 U.S.C. § 2333 and other statutes against Arab Bank, PLC. *See* Second Amended Complaint, *Litle v. Arab Bank, PLC*, No. 04-cv-5449 (NG) (VVP) (E.D.N.Y. Apr. 10, 2007), ECF No. 307. The complaint, signed by attorney Mark S. Werbner of Sayles Werbner P.C., states that the above-named victims were U.S. citizens. *See id.* at 3, 60, 107.

302. “Yusef Ibrahim Hasan Atalla” (“Hasan Atalla”) died perpetrating the attack. *See* Spitzen Decl. ¶ 61.

303. Attached as Exhibit 138 is a true and correct copy of Social Investigation Report documents as to Hasan Atalla that Defendants produced in connection with jurisdictional

discovery in this action, bearing production numbers Shatsky-JD01058 and Shatsky-JD01065 to Shatsky-JD01069, together with a certified translation of such records from Arabic into English.

Hasan Atalla's Social Investigation Report reflects that:

- a. On August 31, 2002, Hasan Atalla "was martyred after he raided the settlement of Brakha and a fire fight broke out between him and the residents of the settlement. As a result, one settler was killed and others were injured. The martyr was killed by one of the settlers." *See* Ex. 138 at Shatsky-JD01066.
- b. The "Confirmation of the director general" states Hasan Atalla "is to be confirmed as an Al-Aqsa Martyr as of 9.1.2002 and paid [Redacted]." *See* Ex. 138 at Shatsky-JD01068.
- c. After Hasan Atalla's father died in 2006, Hasan Atalla's payments were "transferred to the martyr's mother (Wisam Darwish Mutawi Atalla, ID No. ^{Redacted}0548)." *See* Ex. 138 at Shatsky-JD01069.
- d. In November 2020, by "[a]ction of the director general," the disbursement to Hasan Atalla's beneficiary, "his mother," was renewed and continued. *See* Ex. 138 at Shatsky-JD01058.

304. Attached as Exhibit 139 are true and correct copies of Martyr Payment Records as to Hasan Atalla that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00144 to Shatsky-JD00148, together with a certified translation of such records from Arabic into English.

305. Hasan Atalla's Martyr Payment Records reflect that the "Case Type" is "Martyr," and that Defendants made monthly payments to his beneficiary and mother "Wisam Darwish

Mutawi Atalla" (Identification No. "Redacted 0548") between May 2020 and April 2021 totaling 16,800 shekels. *See* Ex. 139 at Shatsky-JD00144, Shatsky-JD00148.

306. **Zaynab Ali Isa Abu Salem.** On September 22, 2004, a suicide terrorist detonated an explosive device near the French Hill section of Jerusalem, killing two and wounding 17 others, including U.S. citizen Michael Spitz. *See Miller v. Arab Bank, PLC*, 372 F. Supp. 3d 33, 41 (E.D.N.Y. 2019); Complaint at 11, *Pam v. Arab Bank*, No. 18-cv-4670 (PKC) (CLP) (E.D.N.Y. Aug. 17, 2018), ECF No. 1.

307. "Zaynab Ali Isa Abu Salem" died perpetrating the attack. *See* Spitzen Decl. ¶ 61.

308. Attached as Exhibit 140 is a true and correct copy of Social Investigation Report documents as to "Zaynab Ali Abu Salem" ("Abu Salem") that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00650 and Shatsky-JD00659 to Shatsky-JD00663, together with a certified translation of such records from Arabic into English. Abu Salem's Social Investigation Report reflects that:

- a. On September 22, 2004, Abu Salem "became a martyr during the perpetration of a martyrdom operation in the French Hill / Jerusalem, which claimed the lives of several soldiers and severely injured several people in the enemy ranks." *See* Ex. 140 at Shatsky-JD00660.
- b. The "Decision of the establishment's director" states "Abu Salem "is confirmed as a martyr of the Al-Aqsa Intifada," and "became a martyr after she blew her self [sic] up in Jerusalem on 9.22.2004." *See* Ex. 140 at Shatsky-JD00662.
- c. Abu Salem's mother is listed as "Sahar Yousuf Abd A-Rahman Abu Salem" (Identification No. "Redacted 8803"). *See* Ex. 140 at Shatsky-JD00660.

- d. On August 14, 2012, by “Action of the director general,” Abu Salem’s “disbursement” was “transferred fully to martyr’s mother as of 8.1.2012” because the “martyr’s father has since died.” *See* Ex. 140 at Shatsky-JD00663.
- e. On October 27, 2019, the Establishment’s director general confirmed the recommendation to “[c]ontinue the disbursement for the benefit of the martyr’s mother,” as she “is the sole beneficiary and is still alive.” *See* Ex. 140 at Shatsky-JD00650.

309. Attached as Exhibit 141 are true and correct copies of Martyr Payment Records as to Abu Salem that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00209 to Shatsky-JD00214, together with a certified translation of such records from Arabic into English.

310. Abu Salem’s Martyr Payment Records reflect that her “Case Type” is “Martyr,” and that Defendants made monthly payments to Abu Salem’s mother and beneficiary “Sahar Yousuf Abd A-Rahman Abu Salem” (Identification No. “^{Redacted} 8803”) between May 2020 and April 2021 totaling 16,800 shekels. *See* Ex. 141 at Shatsky-JD00209, Shatsky-JD00214.

Defendants’ Payments to Designees of Individuals by Reason of Their Imprisonment for Acts of Terrorism That Injured or Killed U.S. Nationals.

311. Attached as Exhibit 142 is a true and correct copy of excerpts of the transcript of the deposition of Abdel Jabbar Salem, held on July 27, 2021 and July 28, 2021. Mr. Salem was designated by Defendants as a Fed. R. Civ. P. 30(b)(6) witness. *See* Ex. 142 at 19:14-20:1.

312. Mr. Salem is employed by the Ministry of Finance of the PA as the “director/manager for the salaries in the Palestinian Authority.” *Id.* at 12:14-19, 60:16-21. Mr. Salem has held this position for ten (10) years, reports to the PA’s Minister of Finance, and has

been employed by the PA since 1995. *Id.* at 12:14-14:17. He is “responsible for overseeing the distribution of the payment[s]” to certain prisoners. *Id.* at 16:1-21.

313. The PA’s Commission for Prisoners and Ex-Prisoners, also referred to by Mr. Salem as the Prisoners’ Affairs Department (the “Commission”), decides which prisoners and ex-prisoners receive payments according to “Palestinian law,” and prepares such payments which are “distributed through the Ministry of Finance.” *Id.* at 34:11-37:18. “[W]hat really determines the amount [of payment] is the duration, the actual duration of the presence of the prisoner in prison.” *Id.* at 46:9-15.

314. “The PA pays the allocations for the families and the members of the prisoners, and the PA make [sic] the payments, all the payments, and part of these payments goes towards the families of the prisoners.” *Id.* at 27:14-18. The funds used by the PA to make such prisoner payments is obtained from “the income that the PA receives from the taxes, from the customs, from the merchants, from the revenues.” *Id.* at 27:20-24.

315. Defendants admitted that if a prisoner was imprisoned for shoplifting, he would not be eligible to receive prisoner payments. *Id.* at 78:18-24, 87:19-88:1.

316. Defendants further testified that “the act of terror is from the Israeli point of view. For us, we don’t consider it, acknowledge it. It’s either a political or a security act.” *Id.* at 86:3-6. To be eligible to receive payments as a result of imprisonment, Defendants’ “criteria or the standards say it has either to be or a security of a political” act. *Id.* at 87:19-88:1.

317. The Head of the Commission (Qadri Abu Bakr) reports to the Prime Minister, and the Ministry of Finance sets the operating budget for the Commission. *Id.* at 36:8-17, 42:12-43:2.

318. As discussed further herein, Defendants produced files prepared and maintained by the Commission (“Prisoner Files”), on which Defendants rely in the decision to make payments to a prisoner’s designee. Ex. 142 at 63:1-9; *see, e.g.* Ex. 158 (Alaa Raed Saleh Zughayer Prisoner File at Shatsky-JD01857, Shatsky-JD01862 to Shatsky-JD01867, Shatsky-JD01875 to Shatsky-JD01878, and Shatsky-JD01880 to Shatsky-JD01886).

319. Defendants’ Prisoner Files include a form created by the PA containing prisoner information requested to be submitted to the Commission (including arrest information, the Israeli court indictment and verdict/decision, prisoner beneficiary(ies), religion, marital status, refugee status, education). *See* Ex. 142 at 190:3-194:20. Of the information requested by the Commission to determine whether Defendants make payments to prisoners, “the most important document is the indictment.” *Id.* at 194:5-8.

320. As discussed further herein, Defendants produced records of Defendants’ payments to prisoners (“Prisoner Payment Records”). Prisoner Payment Records are maintained by the PA in its normal course of business, and “kept in the Ministry of Finance after making the payment on the monthly basis.” *See id.* at 31:22-32:3.

321. As detailed below, Defendants’ deposition testimony and documents produced by Defendants establish that since April 18, 2020, Defendants have made at least 732 payments to designees of at least 54 individuals who have been imprisoned (after being tried or pleading guilty) for committing acts of terrorism that injured or killed United States nationals by reason of such imprisonment, totaling at least 4,002,278.19 shekels.

322. ***Mohammed Atiya Mahmoud Abu Warda.*** “Mohammed Atiya Mahmoud Abu Warda” (“Abu Warda”) pled guilty for his role in perpetrating the February 25, 1996 Attack, in

which three U.S. citizens were killed and one was injured (*see ¶¶ 207-208, supra*). *See* Kaufman Decl. ¶ 7.

323. Attached as Exhibit 143 is a true and correct copy of Prisoner File documents as to Abu Warda that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD01110 to Shatsky-JD01142, together with a certified translation of documents bearing production numbers Shatsky-JD01110 to Shatsky-JD01111, Shatsky-JD01113 to Shatsky-JD01118, and Shatsky-JD01120 to Shatsky-JD01142 from Arabic into English. *See* Ex. 142 at 58:11-59:16.

324. Abu Warda's Prisoner File contains Israeli court documents detailing and reflecting the indictment, adjudication, and sentencing of Abu Warda as a result of Abu Warda's role in perpetrating the February 25, 1996 suicide terrorist bombing on a bus in Jerusalem. *See* Ex. 143 at Shatsky-JD01120-1142.

325. Abu Warda was indicted, in part, on counts related to his membership in Hamas, and for the intentional causation of death of (among other individuals) Mattiyahu Eisenfeld, Sara Duker, and Yiliam Weinstein in the February 25, 1996 Attack. *See* Ex. 143 at Shatsky-JD01121-22, Shatsky-JD01125, Shatsky-JD01127.

326. Abu Warda pleaded guilty to charges related to the February 25, 1996 Attack, and was "convicted pursuant to his admission to the indictment, one of the most severe that was ever submitted in the courts of this region and the State of Israel. The indictment, which includes 45 different counts [concerning both the February 25, 1996 Attack and other terrorist attacks], describes the part that the Defendant and his activities played in carrying out the suicide attacks that cumulatively caused the deaths of 45 people." *See* Ex. 143 at Shatsky-JD01138, Shatsky-JD01140. *See* Kaufman Decl. ¶ 7.

327. Abu Warda was sentenced to life imprisonment on dozens of counts, including life imprisonment sentences for the murder of [Ira] William (Yitzchak) Weinstein, Sarah Duker, and Matityahu [Matthew] Eisenfeld in connection with the February 25, 1996 Attack. *See Ex. 143 at Shatsky-JD01141-42.* Abu Warda was also sentenced to life imprisonment for the “fifty injured in the terror attack on bus line 18 that occurred on February 25, 1996.” *See id.*

328. Abu Warda’s Prisoner File contains certificates from the International Committee of the Red Cross certifying that Abu Warda was arrested by the Israeli authorities and sentenced to life imprisonment. *See Ex. 143 at Shatsky-JD01111-15; Ex. 142 at 62:5-25.*

329. The Commission inspected the Israeli court’s indictment of Abu Warda and relied on the Red Cross certificates in connection with its determination to make payments to Warda’s family designee. *See Ex. 142 at 63:1-9, 71:9-20.*

330. Defendants testified that Abu Warda “entered prison either because of a security or a political act,” and “is eligible for the allocation [payment] based on that he is still in prison, and it’s decided by the” Commission. *See Ex. 142 at 67:21-68:4, 85:10-15.*

331. Defendants testified that Warda was imprisoned for the crimes described in the Israeli Court indictment, and that Abu Warda’s family designee received these payments “[b]ecause of [Abu Warda’s] presence in prison and the accusations that were accused from the Israeli court.” *See Ex. 142 at 143:14-19.*

332. Attached as Exhibit 144 are true and correct copies of Prisoner Payment Records as to Abu Warda that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00259 to Shatsky-JD00266, together with a certified translation of such records from Arabic into English. *See Ex. 142 at 51:22-53:21.*

333. Abu Warda's Prisoner Payment Records reflect that Defendants made monthly payments to Abu Warda's designee between May 2020 and May 2021 totaling 93,461.74 shekels. *See* Ex. 144 at Shatsky-JD00266; Ex. 142 at 31:1-7, 54:3-57:20.

334. ***Hussam Abdul-Kader Ahmad Halabi.*** "On March 24, 2002, terrorists with machine guns attacked a public bus near Neve Tzuf, an Israeli settlement in the West Bank. Esther Klieman, an American schoolteacher, was shot and killed. In the aftermath, Al Aqsa Martyrs Brigade, an organization designated as a Foreign Terrorist Organization by the U.S. Department of State, claimed responsibility for the attack." *See Estate of Klieman v. Palestinian Auth.*, 82 F. Supp. 3d 237, 240 (D.D.C. 2015), *aff'd sub nom. Estate of Klieman ex rel. Kesner v. Palestinian Auth.*, 923 F.3d 1115 (D.C. Cir. 2019), *cert. granted, judgment vacated*, 140 S. Ct. 2713 (2020), *and opinion reinstated in part*, No. 15-7034, 2020 WL 5361653 (D.C. Cir. Aug. 18, 2020). This declaration refers to the attack as the "March 24, 2002 Attack."

335. "Hussam Abdul-Kader Ahmad Halabi" ("Halabi") pleaded guilty to his role in perpetrating the March 24, 2002 Attack. *See* Kaufman Decl. ¶ 7.

336. Attached as Exhibit 145 is a true and correct copy of Prisoner File documents as to Halabi that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD01190 to Shatsky-JD01214, together with a certified translation of documents bearing production numbers Shatsky-JD01190 to Shatsky-JD01191, Shatsky-JD01193 to Shatsky-JD01194, Shatsky-JD01196 to Shatsky-JD01197, Shatsky-JD01200 to Shatsky-JD01202, and Shatsky-JD01204 to Shatsky-JD01214 from Arabic into English. *See* Ex. 142 at 147:2-5.

337. Halabi's Prisoner File contains Israeli court documents reflecting the indictment of Halabi a result of his role in perpetrating the March 24, 2002 Attack. Halabi was indicted, in

part, for intentionally causing the death of Esther Klieman in connection with the March 24, 2002 Attack. *See* Ex. 145 at Shatsky-JD01208-14.

338. Halabi pleaded guilty to charges related to the March 24, 2002 Attack, and received a life sentence in prison. *See* Ex. 142 at 147:9-12; Ex. 145 at Shatsky-JD01191.

339. Halabi's Prisoner File reflects that Halabi is single, and the "beneficiary" or designee of his prisoner payments is Halabi himself. *See* Ex. 142 at 147:22-148:3; Ex. 145 at Shatsky-JD01201.

340. Attached as Exhibit 146 is a true and correct copy of Prisoner Payment Records as to Halabi that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00292 to Shatsky-JD00293, together with a certified translation of such records from Arabic into English. Ex. 142 at 146:22-25.

341. Halabi's Prisoner Payment Records reflect that Defendants made monthly payments to Halabi's designee between May 2020 and May 2021 totaling 45,198.61 shekels. Ex. 146 at Shatsky-JD00292-3.

342. Defendants testified that Halabi's Prisoner Payment Records show such payments from May 2020 through May 2021, and further testified that Halabi is in prison because of the crimes described in the Israeli court indictment and receives payments because he is in prison according to the Israeli allegations. *See* Ex. 142 at 146:22-25, 156:19-157:16.

343. ***Mohammed Abdel-Basset al-Haroub.*** On November 19, 2015, U.S. citizens Ezra Schwartz, Michael Benzakein, and Jason Geller were riding in a van to deliver care packages to Israeli soldiers and beautify a park in honor of three Israeli boys who had been kidnapped and murdered in 2014. When the van was stopped at a busy intersection in Gush Etzion, a terrorist affiliated with Hamas opened fire into the traffic with an automatic

submachine gun, killing Schwartz and injuring Benzakein and Geller. *See DOJ/OVT Interactive World Map - Near East*, Justice.gov, <https://www.justice.gov/nsdovt/dojovt-interactive-world-map/near-east> (last visited Sept. 21, 2021) (attached as Exhibit 49). *See also* Exhibit 147 (Declaration of Ruth Schwartz dated October 13, 2019 filed in *Schwartz v. Islamic Republic of Iran*, No. 18-cv-1349 (D.D.C. Oct. 17, 2019) (ECF No. 28-1) (stating she and her son Ezra Schwartz were U.S. citizens and describing Ezra's death and resulting injuries); Exhibit 148 (Declaration of Michael Benzakein dated October 16, 2019 filed in *Schwartz v. Islamic Republic of Iran*, No. 18-cv-1349 (D.D.C. Oct. 17, 2019) (ECF No. 28-6) (stating he was born in New York on July 10, 1997 and describing injuries as a result of the attack); Exhibit 149 (Declaration of Jason Geller dated October 16, 2019 filed in *Schwartz v. Islamic Republic of Iran*, No. 18-cv-1349 (D.D.C. Oct. 17, 2019) (ECF No. 28-12) (stating he was born in Long Island, New York on October 14, 1997 and describing injuries as a result of the attack).

344. “Mohammed Abdel Basset al-Haroub” pled guilty for his role in perpetrating the attack. *See* Kaufman Decl. ¶ 7.

345. Attached as Exhibit 150 is a true and correct copy of Prisoner File documents as to “Mohammed Abdel-Basset Awda Haroub” (“Haroub”) that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD01348 to Shatsky-JD01367, together with a certified translation of documents bearing production numbers Shatsky-JD01348, Shatsky-JD01351 to Shatsky-JD01358, Shatsky-JD01360 to Shatsky-JD01363, and Shatsky-JD01365 to Shatsky-JD01367 from Arabic into English. Ex. 142 at 159:4-7, 166:13-22.

346. Haroub's Prisoner File contains Israeli court documents reflecting the indictment and sentencing of Haroub a result of Haroub's role in perpetrating the November 19, 2015 terrorist attack. *See* Ex. 150 at Shatsky-JD01351-58, Shatsky-JD01365-67.

347. Haroub was indicted, in part, for intentionally causing the death of Ezra Schwartz, and attempting to cause the death of other individuals in connection with the November 19, 2015 terrorist attack. *See* Ex. 150 at Shatsky-JD01366.

348. Haroub was sentenced to life imprisonment for the murder of Ezra Schwartz. *See* Ex. 150 at Shatsky-JD01358. Haroub was further convicted and sentenced to an additional term of life imprisonment for ten (10) offenses of attempted intentional causation of death of additional individuals, with the court noting that Haroub attempted to cause the death of "Jason Geller and Michael Ben Zaken." *Id.* at Shatsky-JD01352, Shatsky-JD01358.

349. Haroub's Prisoner File contains a certificate from the International Committee of the Red Cross certifying that Haroub was arrested by the Israeli authorities and sentenced to life imprisonment. *See* Ex. 150 at Shatsky-JD01350.

350. Haroub's Prisoner File reflects the designation of his mother as the "beneficiary" or designee of Haroub's prisoner payments, or "allowance." *See* Ex. 150 at Shatsky-JD01362.

351. Attached as Exhibit 151 is a true and correct copy of Prisoner Payment Records as to Haroub that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00363 to Shatsky-JD00364, together with a certified translation of such records from Arabic into English. *See* Ex. 142 at 159:20-23.

352. Haroub's Prisoner Payment Records reflect that Defendants made monthly payments to his mother between May 2020 and May 2021 totaling 39,365.65 shekels. *See* Ex. 151 at Shatsky-JD00363-64; Ex. 142 at 159:20-160:5.

353. Defendants testified that Haroub is in prison for reasons “[a]ccording to the Israeli indictment” and Israeli court documents in Haroub’s Prisoner File, and that his mother is receiving his prisoner payments “because he’s prison – he’s present in prison.” *See* Ex. 142 at 166:5-12, 168:4-170:22.

354. ***Yahia Muhamad Naif Abdullah Hajj Hamad.*** On October 1, 2015, U.S. citizen Eitam Henkin was driving past the town of Beit Furik with his wife and family when members of Hamas overtook the car and shot Eitam Henkin and his wife in front of their children. *See* Ex. 152 (Declaration of Judah Herzl Henkin dated August 19, 2020, filed in *Henkin v. Islamic Republic of Iran*, No. 1:18-cv-01273-RCL (D.D.C. Aug. 27, 2020) (ECF No. 21-4). *See also* Kaufman Decl. at ¶ 11 (discussing court documents that note Eitan Henkin as a victim in this attack). This declaration refers to the attack as the “October 1, 2015 Attack.”

355. “Yahia Muhamad Naif Abdullah Hajj Hamad” (“Hajj Hamad”) was convicted for his role in perpetrating the October 1, 2015 Attack. *See* Kaufman Decl. ¶ 8.

356. Attached as Exhibit 153 is a true and correct copy of Prisoner File documents as to Hajj Hamad that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD01782 to Shatsky-JD01805, together with a certified translation of documents bearing production numbers Shatsky-JD01782 and Shatsky-JD01787 to Shatsky-JD01804 from Arabic into English. *See* Ex. 142 at 171:18-172:5.

357. Hajj Hamad’s Prisoner File contains Israeli court documents detailing and reflecting the indictment of Hajj Hamad a result of Haroub’s role in perpetrating the October 1, 2015 terrorist attack. *See* Ex. 153 at Shatsky-JD01790-1804.

358. Hajj Hamad was indicted, in part, for intentionally causing the death of Eitam Henkin in connection with the October 1, 2015 Attack. *See* Ex. 153 at Shatsky-JD01795-1799.

359. Hajj Hamad's Prisoner File reflects that he received a life sentence, and Hajj Hamad designated his mother Hiyam Jawdat Abdullah Hajj Hamad as the "beneficiary" or designee of Hajj Hamad's prisoner payments. *See* Ex. 153 at Shatsky-JD01787-88; Ex. 142 at 174:7-13.

360. Attached as Exhibit 154 is a true and correct copy of Prisoner Payment Records as to Hajj Hamad that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00524 to Shatsky-JD00525, together with a certified translation of such records from Arabic into English. *See* Ex. 142 at 171:13-172:3.

361. Hajj Hamad's Prisoner Payment Records reflect monthly payments made by Defendants to his mother/beneficiary between May 2020 and May 2021 totaling 40,388.72 shekels. *See* Ex. 154 at Shatsky-JD00525; Ex. 142 at 172:11-16.

362. Defendants testified that Hajj Hamad's imprisonment is based on "the indictment list by the Israeli court." Ex. 142 at 174:14-22. "Based on him being in prison, according to the list of indictment, the allocations are dispensed to his mother." *Id.* at 175:6-8.

363. ***Alaa Raed Salah Zajayer.*** On July 1, 2016, Rabbi Michael Mark and his wife, U.S. citizen Chava Mark were driving with their children in the South Hebron Hills when a terrorist affiliated with Hamas drove up next to them and opened fire with an automatic rifle, killing Michael Mark and severely injuring Chava Mark and their two children (Tehilla and Pedaya). Based on their injuries, the Mark family brought a federal action under 28 U.S.C. § 1605A and other statutes against the Islamic Republic of Iran. *See* Complaint, *Mark v. Islamic Republic of Iran*, No. 20-cv-00651-TNM (D.D.C. March 5, 2020), ECF No. 1. The complaint, signed by attorneys Paul G. Gaston and Asher Perlin, details the attacks and states that Michael and Chava and their two children were U.S. citizens. *See id.* at 3, 7-14, 22-23. *See also* Exhibit

155 (copy of Pedaya Mark Certificate of U.S. Citizenship); Exhibit 156 (copy of Tehilla Mark Certificate of U.S. Citizenship); Exhibit 157 (copy of Chava Mark passport, date of issue June 23, 2010). This declaration refers to the attack as the “July 1, 2016 Attack.”

364. “Alaa Raed Salah Zajayer” was convicted for his role in perpetrating the attack.

See Kaufman Decl. ¶ 8.

365. Attached as Exhibit 158 is a true and correct copy of Prisoner File documents as to “Alaa Raed Saleh Zughayer” (“Zughayer”) that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD01857 to Shatsky-JD01886, together with a certified translation of documents bearing production numbers Shatsky-JD01857, Shatsky-JD01862 to Shatsky-JD01867, Shatsky-JD01875 to Shatsky-JD01878, and Shatsky-JD01880 to Shatsky-JD01886 from Arabic into English. *See* Ex. 142 at 177:2-11.

366. Zughayer’s Prisoner File contains Israeli court documents detailing and reflecting the proceedings, indictment, and sentencing of Zughayer a result of Zughayer’s role in perpetrating the July 1, 2016 Attack. *See* Ex. 158 at Shatsky-JD01862-67, Shatsky-JD01880-86.

367. Zughayer was indicted, in part, for intentionally causing the death of Michael Mark and attempting to intentionally cause the death of Chava Mark, Tehilla Mark, and Pedaya Mark. *See* Ex. 158 at Shatsky-JD01881-85.

368. Zughayer pleaded guilty to the indictment “that recounts the incidents related to the murder of Rabbi Michael Mark … and injuring of his family – Chava Mark, Tehila Mark and Pedaya Mark.” Ex. 158 at Shatsky-JD01863. Zughayer was “convicted according to his admission of the offense of aiding in intentionally causing death … and of three Counts of aiding an attempt to intentionally cause death.” *See* Ex. 158 at Shatsky-JD01863.

369. Zughayer was sentenced to 16 and one-half years' actual imprisonment and three years' suspended sentence. *See* Ex. 158 at Shatsky-JD01867; Ex. 142 at 179:7-12.

370. Zughayer's Prisoner File reflects the designation of himself as the "beneficiary" or designee of his prisoner payments, or "allowance." *See* Ex. 158 at Shatsky-JD01877; Ex. 142 at 178:12-23.

371. Attached as Exhibit 159 is a true and correct copy of Prisoner Payment Records as to Zughayer that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00533 to Shatsky-JD00534, together with a certified translation of such records from Arabic into English. *See* Ex. 142 at 176:17-23.

372. Zughayer's Prisoner Payment Records reflect that Defendants made monthly payments to Zughayer between May 2020 and May 2021 totaling 26,800 shekels. *See* Ex. 159 at Shatsky-JD00534; Ex. 142 at 177:21-178:2.

373. Defendants testified that Zughayer "receives the allocations because of him being in prison based on the indictment list from the Israeli part." Ex. 142 at 182:13-15.

374. **Ahmed Salah.** "Ahmed Salah" was convicted for his role in perpetrating the January 29, 2004 Attack that injured eight U.S. citizens (*see* ¶ 118, *supra*). *See* Kaufman Decl. ¶ 8.

375. Attached as Exhibit 160 is a true and correct copy of Prisoner File documents as to "Ahmed Salah Ahmad Salah" ("Ahmed Salah") that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD01660 to Shatsky-JD01661, Shatsky-JD01666 to Shatsky-JD01667, Shatsky-JD01669 to Shatsky-JD01672, Shatsky-JD01683, and Shatsky-JD01687, together with a certified translation of documents

bearing production numbers Shatsky-JD01666 to Shatsky-JD01667 and Shatsky-JD01669 to Shatsky-JD01672 from Arabic into English. Ahmed Salah's Prisoner File reflects:

- a. Israeli court documents concerning the indictment of Ahmed Salah for his role in perpetrating the January 29, 2004 Attack. *See* Ex. 160 at Shatsky-JD01666-67, Shatsky-JD01669-72.
- b. Certificates of The International Committee of the Red Cross, updated March 4, 2013, December 8, 2013, January 14, 2015, and January 9, 2018 certifying that "Ahmad Salah Admad Salah" was arrested on March 8, 2004 and received a life sentence. *See* Ex. 160 at Shatsky-JD01660-61, Shatsky-JD01683, Shatsky-JD01687.

376. Attached as Exhibit 161 is a true and correct copy of Prisoner Payment Records as to Ahmed Salah that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00494 to Shatsky-JD00495, together with a certified translation of such records from Arabic into English.

377. Ahmed Salah's Prisoner Payment Records reflect that Defendants made monthly payments to his beneficiary Ahmed Salah between May 2020 and May 2021 totaling 28,535.92 shekels. *See* Ex. 161 at Shatsky-JD00494-95.

378. ***Amjad Adel Muhamad Aliwi.*** "Amjad Adel Muhamad Aliwi" ("Aliwi") was convicted for his role in perpetrating the October 1, 2015 Attack in which a U.S. citizen was shot (*see* ¶ 354, *supra*). *See* Kaufman Decl. ¶ 8.

379. Attached as Exhibit 162 is a true and correct copy of Prisoner File documents as to Aliwi that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD01954 to Shatsky-JD01955, Shatsky-JD01962 to

Shatsky-JD01963, Shatsky-JD01966 to Shatsky-JD01977, and Shatsky-JD02008, together with a certified translation of documents bearing production numbers Shatsky-JD01954, Shatsky-JD01963, and Shatsky-JD01966 to Shatsky-JD01977 from Arabic into English. Aliwi's Prisoner File reflects:

- a. The Commission's "Main Prisoner Form" stating that Aliwi was arrested on October 6, 2015 while in a detention center (his sixth arrest). *See* Ex. 162 at Shatsky-JD01963.
- b. Israeli court documents concerning the indictment of Aliwi for his role in perpetrating the October 1, 2015 Attack (Ex. 162 at Shatsky-JD01966-77), including the count of "Intentional causation of death" of Eitam Henkin. *See* Ex. 162 at Shatsky-JD01970.
- c. Certificates of The International Committee of the Red Cross, updated July 31, 2016, September 25, 2016, and July 3, 2017 certifying that "Adjad Adel Mohammad Eleiwi" was arrested on October 6, 2015 and received a life sentence. *See* Ex. 162 at Shatsky-JD01955, Shatsky-JD01962, Shatsky-JD02008.
- d. Confirmation by the Commission, dated September 25, 2016, that Aliwi's "arrest periods ... are security-related." *See* Ex. 162 at Shatsky-JD01954.

380. Attached as Exhibit 163 is a true and correct copy of Prisoner Payment Records as to Aliwi that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00527 to Shatsky-JD00528, together with a certified translation of such records from Arabic into English.

381. Aliwi's Prisoner Payment Records reflect that Defendants made monthly payments to his beneficiary "Miya[*] Ya'qub Aliwi" between May 2020 and May 2021 totaling 57,707.50 shekels. *See* Ex. 163 at Shatsky-JD00528.

382. ***Balal Abu-Ga'aanem.*** "Balal Abu-Ga'aanem" was convicted for his role in perpetrating the October 13, 2015 Attack that killed and/or injured three U.S. citizens (*see ¶¶ 138-139, supra*). *See* Kaufman Decl. ¶ 8.

383. Attached as Exhibit 164 is a true and correct copy of Prisoner File documents as to "Bilal Omar Mahmoud Abu Ghanem" ("Ghanem") that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD01928 to Shatsky-JD01931, Shatsky-JD01933 to Shatsky-JD01934, Shatsky-JD01936, and Shatsky-JD01938 to Shatsky-JD01942, together with a certified translation of documents bearing production numbers Shatsky-JD01933 to Shatsky-JD01934, and Shatsky-JD01938 to Shatsky-JD01942 from Arabic into English. Ghanem's Prisoner File reflects:

- a. The Commission's "Main Prisoner Form" stating that Ghanem was arrested on October 13, 2015. *See* Ex. 164 at Shatsky-JD01933.
- b. Israeli court documents concerning the indictment of "Bilal Abu Ghanem" for his role in perpetrating the October 13, 2015 Attack. *See* Ex. 164 at Shatsky-JD01938-42.
- c. Certificates of The International Committee of the Red Cross, updated November 20, 2015, January 24, 2016, May 19, 2016, August 25, 2016, December 22, 2016, certifying that Ghanem was arrested on October 13, 2015 and was awaiting trial. *See* Ex. 164 at Shatsky-JD01928-1931, Shatsky-JD01936.

d. That “Ataf Ali Abu Ghanem” is listed as Ghanem’s “Authorized Representative (Beneficiary)” and mother. *See* Ex. 164 at Shatsky-JD01934.

384. Attached as Exhibit 165 is a true and correct copy of Prisoner Payment Records as to Ghanem that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00529 to Shatsky-JD00530, together with a certified translation of such records from Arabic into English.

385. Ghanem’s Prisoner Payment Records reflect that Defendants made monthly payments to Ghanem’s beneficiary “Ataf Ali Abu Ghanem” between May 2020 and May 2021 totaling 61,055 shekels. *See* Ex. 165 at Shatsky-JD00530.

386. **Hilmi Hamash.** “Hilmi Hamash” was convicted for his role in perpetrating the January 29, 2004 Attack that injured eight U.S. citizens (*see ¶ 118, supra*). *See* Kaufman Decl. ¶ 8.

387. Attached as Exhibit 166 is a true and correct copy of Prisoner File documents as to “Hilmi Abd Al-Karim Muhammad Hamash” (“Hamash”) that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD01909 to Shatsky-JD01912, Shatsky-JD01914, Shatsky-JD01918 to Shatsky-JD01919, and Shatsky-JD01921 to Shatsky-JD01925, together with a certified translation of documents bearing production numbers Shatsky-JD01918 to Shatsky-JD01919, and Shatsky-JD01922 to Shatsky-JD01925 from Arabic into English. Hamash’s Prisoner File reflects:

a. The Commission’s “Main Prisoner Form” stating that Hamash was arrested on March 9, 2004 and received a “life term” sentence. *See* Ex. 166 at Shatsky-JD01918.

- b. Israeli court documents concerning the indictment and sentence of life imprisonment of Hamash for his role in perpetrating the January 29, 2004 Attack. *See* Ex. 166 at Shatsky-JD01922-1925.
- c. Certificates of The International Committee of the Red Cross, updated March 10, 2011, July 8, 2012, March 24, 2014, January 4, 2015, January 9, 2018, February 4, 2018, certifying that “Helmi Abdel Karim Mohammad Hamash” was arrested on March 9, 2004 and received a life sentence. *See* Ex. 166 at Shatsky-JD01909-Shatsky-JD01912, Shatsky-JD01914, Shatsky-JD01921.
- d. That “The prisoner himself” is listed as Hamash’s “Authorized Representative (Beneficiary).” *See* Ex. 166 at Shatsky-JD01919.

388. Attached as Exhibit 167 is a true and correct copy of Prisoner Payment Records as to Hamash that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00505 to Shatsky-JD00506, together with a certified translation of such records from Arabic into English.

389. Hamash’s Prisoner Payment Records reflect that Defendants made monthly payments to Hamash as his own beneficiary between May 2020 and May 2021 totaling 40,020.77 shekels. *See* Ex. 167 at Shatsky-JD00505-6.

390. ***Hussam al-Qawasmeh.*** On Thursday, June 12, 2014, sixteen-year-old U.S. citizen Naftali Fraenkel and two classmates were kidnapped by perpetrators affiliated with Hamas. *See Fraenkel v. Islamic Republic of Iran*, 892 F.3d 348, 351 (D.C. Cir. 2018). Their bodies were located after an 18-day search. *See id.* at 352.

391. “Hussam al-Qawasmeh” was convicted for his role in perpetrating the attack. *See* Kaufman Decl. ¶ 8.

392. Attached as Exhibit 168 is a true and correct copy of Prisoner File documents as to “Hussam Ali Hasan Qawasmeh” (“Hussam Qawasmeh”) that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD01743 to Shatsky-JD01744, Shatsky-JD01748, Shatsky-JD01761, Shatsky-JD01764 to Shatsky-JD01765, and Shatsky-JD01779 to Shatsky-JD01781, together with a certified translation of documents bearing production numbers Shatsky-JD01764 to Shatsky-JD01765, and Shatsky-JD01779 to Shatsky-JD01781 from Arabic into English. Hussam Qawasmeh’s Prisoner File reflects:

- a. The Commission’s form stating that Hussam Qawasmeh was arrested on July 11, 2014 and was detained. *See* Ex. 168 at Shatsky-JD01764.
- b. Israeli court documents concerning the indictment of Hussam Qawasmeh for his role in perpetrating the June 12, 2014 attack, including the execution of Naftali Fraenkel. *See* Ex. 168 at Shatsky-JD01779-81.
- c. Certificates of The International Committee of the Red Cross, updated February 12, 2015, October 7, 2015, October 18, 2016, and January 3, 2019, certifying that “Hossam Ali Hassan Qawasmeh” was arrested on July 11, 2014 and received a life sentence. *See* Ex. 168 at Shatsky-JD01743-44, Shatsky-JD01748, Shatsky-JD01761.
- d. That “Ghada Atef Jum’ a Qawasmeh” is listed as Hussam Qawasmeh’s “First Beneficiary” and wife. *See* Ex. 168 at Shatsky-JD01765.

393. Attached as Exhibit 169 is a true and correct copy of Prisoner Payment Records as to Hussam Qawasmeh that Defendants produced in connection with jurisdictional discovery in

this action, bearing production numbers Shatsky-JD00520 to Shatsky-JD00523, together with a certified translation of such records from Arabic into English.

394. Hussam Qawasmeh's Prisoner Payment Records reflect that Defendants made monthly payments to Hussam Qawasmeh's beneficiary "Ghada Atef Jum'a al-Qawasmeh" between May 2020 and May 2021 totaling 83,069.47 shekels. *See* Ex. 169 at Shatsky-JD00523.

395. ***Ibrahim Jamil Abd al-Ghani Hamed.*** The following U.S. citizens received a judgment under 18 U.S.C. § 2333 caused by injuries inflicted by an attack at Hebrew University in Jerusalem on July 31, 2002: Katherine Baker, Benjamin Blutstein (estate of), Rebekah Blutstein, Richard Blutstein, Diane Carter (estate of), Larry Carter, Shaun Coffel, Robert L. Coulter, Jr., Diane Coulter Miller, Robert L. Coulter, Sr., Janis Ruth Coulter (estate of), Norman Gritz (estate of), David Gritz (estate of), and Nevenka Gritz. *See Sokolow v. Palestine Liberation Org.*, No. 04-cv-0397 (GBD), 2015 WL 10852003, at *2–3 (S.D.N.Y. Oct. 1, 2015). *See also* Exhibit 4 (*Patterns of Global Terrorism Report*, U.S. Dep't of State, Bureau of Counterterrorism and Countering Violent Extremism (2002)) at 2 ("On 31 July a bomb planted by HAMAS terrorists exploded at Hebrew University in Jerusalem, killing nine persons and wounding 87 others. Among the dead were five US citizens—Benjamin Blutstein, Marla Bennet, Diane Leslie Carter, Janis Ruth Coulter, and David Gritz."). This declaration refers to the attack as the "July 31, 2002 Attack."

396. "Ibrahim Jamil Abd al-Ghani Hamed" was convicted for his role in perpetrating the July 31, 2002 Attack. *See* Kaufman Decl. ¶ 8.

397. Attached as Exhibit 170 is a true and correct copy of Prisoner File documents as to "Ibrahim Jamil Abd el-Ghani Hamed" ("Ghani Hamed") that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-

JD01550 to Shatsky-JD01551, Shatsky-JD01557 to Shatsky-JD01559, and Shatsky-JD01562 to Shatsky-JD01582, together with a certified translation of documents bearing production numbers Shatsky-JD01551, Shatsky-JD01557 to Shatsky-JD01559 and Shatsky-JD01562 to Shatsky-JD01582 from Arabic into English. Ghani Hamed's Prisoner File reflects:

- a. The Commission's "Main Prisoner Form" stating that Ghani Hamed was arrested on May 23, 2006 and detained. *See* Ex. 170 at Shatsky-JD01558.
- b. Israeli court documents concerning the indictment of Ghani Hamed for various offenses, including his role in perpetrating the July 31, 2002 Attack. *See* Ex. 170 at Shatsky-JD01562-1582.
- c. Certificates of The International Committee of the Red Cross, updated August 13, 2013, January 19, 2015, and July 20, 2017, certifying that "Ibrahim Jamil Abdel Ghani Hamed" was arrested on May 23, 2006 and received a life sentence. *See* Ex. 170 at Shatsky-JD01550, Shatsky-JD01551, Shatsky-JD01557.
- d. "Muhammad Najib Abd el-Ghani Hamed" is listed as Ghani Hamed's "Authorized Representative (Beneficiary)" and brother. *See* Ex. 170 at Shatsky-JD01559.

398. Attached as Exhibit 171 is a true and correct copy of Prisoner Payment Records as to Ghani Hamed that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00442 to Shatsky-JD00449, together with a certified translation of such records from Arabic into English.

399. Ghani Hamed's Prisoner Payment Records reflect that Defendants made monthly payments to beneficiaries "Muhammad Najib Jamil Hamed" and "Al-Karamah Housing

Cooperative for [last word cut off]” between May 2020 and May 2021 totaling 92,876 shekels.

Ex. 171 at Shatsky-JD00448-49.

400. *Ayad Fatafta*. On December 18, 2010, two Palestinian terrorists abducted U.S. citizen Kristine Luken and another woman, before repeatedly stabbing them, killing Luken and severely injuring the other. *See* Ex. 172 (Affidavit of FBI Special Agent Nicole Mercer in Support of an Arrest Warrant and a Criminal Complaint dated April 13, 2017, *United States v. Fatafta*, No. 17-mj-229 (D.D.C. Apr. 13, 2017)) at 2-5.

401. “Ayad Fatafta” was convicted for his role in perpetrating the attack. *See* Kaufman Decl. ¶ 8.

402. Attached as Exhibit 173 is a true and correct copy of Prisoner File documents as to “Iyad Hasan Hussein Fatafta” (“Fatafta”) that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD01726 to Shatsky-JD01730 and Shatsky-JD01738 to Shatsky-JD01739, together with a certified translation of documents bearing production numbers Shatsky-JD01729 to Shatsky-JD01730, and Shatsky-JD01738 to Shatsky-JD01739 from Arabic into English. Fatafta’s Prisoner File reflects:

- a. The Commission’s “Main Prisoner Form” stating that Fatafta was arrested on December 21, 2010 and detained. *See* Ex. 173 at Shatsky-JD01729.
- b. Israeli court documents concerning the indictment of Fatafta for various offenses, including his role in perpetrating the December 18, 2010 attack. *See* Ex. 173 at Shatsky-JD01738-1739.
- c. Certificates of The International Committee of the Red Cross, updated June 3, 2012, March 23, 2014, and August 9, 2015, certifying that “Ayad Hassan Hossein

Fataftah” was arrested on December 21, 2010 and received a life sentence. *See* Ex. 173 at Shatsky-JD01726-1728.

d. That “Sanaa Ahmad Hasan Fatafta” is listed as Fatafta’s “Authorized Representative (Beneficiary)” and wife. *See* Ex. 173 at Shatsky-JD01730.

403. Attached as Exhibit 174 is a true and correct copy of Prisoner Payment Records as to Fatafta that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00516 to Shatsky-JD00519, together with a certified translation of such records from Arabic into English.

404. Fatafta’s Prisoner Payment Records reflect that Defendants made monthly payments to his beneficiary “Sanaa[*] Ahmad Fatafta” between May 2020 and May 2021 totaling 67,325.48 shekels. *See* Ex. 174 at Shatsky-JD00519.

405. ***Izz al-din Halid Hussain al-Hamamra.*** On February 22, 2004, U.S. citizen Rebecca Nevies was riding the No. 14 bus in Jerusalem when a suicide terrorist detonated an explosive device, killing 8 and injuring 60 others, including Nevies. *See Suicide Terrorists in the Current Conflict, ISRAELI SECURITY AGENCY* at 4 (a copy of the relevant sections of the translated report is attached as Exhibit 44); Declaration of Itzhak Ilan 1–3, *Shatsky v. Syrian Arab Republic*, No. 08-cv-0496 (RJL) (D.D.C. Sept. 15, 2020), ECF No. 50-1.

406. Based on her injuries, Nevies brought a federal action under 18 U.S.C. § 2333 and other statutes against Arab Bank, PLC. *See* Second Amended Complaint, *Little v. Arab Bank, PLC*, No. 04-cv-5449 (NG) (VVP) (E.D.N.Y. Apr. 10, 2007), ECF No. 307. The complaint, signed by attorney Mark S. Werbner of Sayles Werbner P.C., states that Nevies was a U.S. citizen. *See id.* at 19, 107.

407. “Izz al-din Halid Hussain al-Hamamra” (“Hamamra”) was convicted for his role in perpetrating the attack. *See* Kaufman Decl. ¶ 8.

408. Attached as Exhibit 175 is a true and correct copy of Prisoner File documents as to Hamamra that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD01703 to Shatsky-JD01708, Shatsky-JD01710 to Shatsky-JD01713, and Shatsky-JD01716 to Shatsky-JD01721, together with a certified translation of documents bearing production numbers Shatsky-JD01705 to Shatsky-JD01708, Shatsky-JD01711 to Shatsky-JD01713, and Shatsky-JD01716 to Shatsky-JD01721 from Arabic into English. Hamamra’s Prisoner File reflects:

- a. The Commission’s “Main Prisoner Form” stating that Hamamra was arrested on March 7, 2004 and received a “Life term” sentence. *See* Ex. 175 at Shatsky-JD01707.
- b. Israeli court documents concerning the indictment of Hamamra, and verdict sentencing Hamamra to life sentences for his role in perpetrating the February 22, 2004 attack. *See* Ex. 175 at Shatsky-JD01711-13, Shatsky-JD01716-21.
- c. Certificates of The International Committee of the Red Cross, updated March 7, 2011, October 5, 2011, March 18, 2014, January 9, 2018, and February 4, 2018, certifying that “Ezzeldin Khaled Hossein Hamamreh” was arrested on March 7, 2004 and received a life sentence. *See* Ex. 175 at Shatsky-JD01703-06, Shatsky-JD01710.
- d. That “[t]he prisoner himself” is listed as Hamamra’s “Authorized Representative (Beneficiary).” *See* Ex. 175 at Shatsky-JD01708.

409. Attached as Exhibit 176 is a true and correct copy of Prisoner Payment Records as to Hamamra that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00514 to Shatsky-JD00515, together with a certified translation of such records from Arabic into English.

410. Hamamra's Prisoner Payment Records reflect that Defendants made monthly payments to his beneficiaries himself and/or "Khadra Hussein Al-Hamamra" between May 2020 and May 2021 totaling 24,544.26 shekels. *See* Ex. 176 at Shatsky-JD00514-15.

411. ***Mahmud Hamad Mahmud Sharitah.*** "On September 19, 2002, shortly before 12:55 p.m., [a suicide terrorist] boarded a number 4 bus near 94 Allenby Street in Tel Aviv. Just as the bus began to move, [the suicide terrorist] activated an explosive device that he was wearing," killing six and injuring 84 others. *See Sisso v. Islamic Republic of Iran*, No. CIV.A. 05-0394 (JDB), 2007 WL 2007582, at *2 (D.D.C. July 5, 2007) (internal citation omitted). One of those killed was Rozana Sisso, the mother of U.S. citizen Avraham Sisso. *See id.* at *1-2.

412. "Mahmud Hamad Mahmud Sharitah" ("Sharitah") pled guilty for his role in perpetrating the attack. *See* Kaufman Decl. ¶ 7.

413. Attached as Exhibit 177 is a true and correct copy of Prisoner File documents as to Sharitah that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD01235 to Shatsky-JD01237, Shatsky-JD01240, Shatsky-JD01242, Shatsky-JD01244 to Shatsky-JD01245, and Shatsky-JD01248 to Shatsky-JD01252, together with a certified translation of documents bearing production numbers Shatsky-JD01236 to Shatsky-JD01237, Shatsky-JD01240, Shatsky-JD01242, Shatsky-JD01244 to Shatsky-JD01245, and Shatsky-JD01249 to Shatsky-JD01252 from Arabic into English. Sharitah's Prisoner File reflects:

- a. The Commission’s “Main Prisoner Form” stating that Sharitah was arrested on October 17, 2002 and received a “Life term” sentence. *See* Ex. 177 at Shatsky-JD01244.
- b. Israeli court documents concerning the indictment of Sharitah for various charges (Ex. 177 at Shatsky-JD01249-1252), including his role in perpetrating the September 19, 2002 attack. *See* Ex. 177 at Shatsky-JD01252.
- c. Certificates of The International Committee of the Red Cross, updated January 11, 2010, July 6, 2010, March 20, 2011, April 22, 2012, March 5, 2013, and June 21, 2015, certifying that “Mahmoud Hamad Mahmoud Shrieteh” was arrested on October 17, 2002 and received a life sentence. *See* Ex. 177 at Shatsky-JD01235-37, Shatsky-JD01240, Shatsky-JD01242, Shatsky-JD01248.
- d. That “Hammad Mahmud Ahmad Sharitah” is listed as Sharitah’s “Authorized Representative (Beneficiary)” and father. *See* Ex. 177 at Shatsky-JD01245.

414. Attached as Exhibit 178 is a true and correct copy of Prisoner Payment Records as to Sharitah that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00294 to Shatsky-JD00300, together with a certified translation of such records from Arabic into English.

415. Sharitah’s Prisoner Payment Records reflect that Defendants made monthly payments to his beneficiary “Hammad Mahmud Ahmad Sharitah” between May 2020 and May 2021, totaling 89,200 shekels. *See* Ex. 178 at Shatsky-JD00300.

416. ***Mohamed Sami Ibrahim Abdullah.*** “Mohamed Sami Ibrahim Abdullah” (“Ibrahim Abdullah”) pleaded guilty for his role in perpetrating the January 22, 2002 Attack that injured seven U.S. citizens (*see ¶ 280, supra*). *See* Kaufman Decl. ¶ 7.

417. Attached as Exhibit 179 is a true and correct copy of Prisoner File documents as to Ibrahim Abdullah that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD01144, Shatsky-JD01147 to Shatsky-JD01148, and Shatsky-JD01151 to Shatsky-JD01165, together with a certified translation of documents bearing production numbers Shatsky-JD01144, Shatsky-JD01147 to Shatsky-JD01148, and Shatsky-JD01152 to Shatsky-JD01165 from Arabic into English. Ibrahim Abdullah's Prisoner File reflects:

- a. The Commission's "Main Prisoner Form" stating that Ibrahim Abdullah was arrested on February 20, 2002 and received a "Life term" sentence. *See* Ex. 179 at Shatsky-JD01148.
- b. Israeli court documents concerning the indictment of Ibrahim Abdullah for his role in perpetrating the January 22, 2002 Attack. *See* Ex. 179 at Shatsky-JD01152-64.
- c. Certificates of The International Committee of the Red Cross, updated January 31, 2010, March 31, 2011, September 27, 2011, and January 8, 2020 certifying that "Mohammad Sami Ibrahim Abdallah" was arrested on February 20, 2002 and received a life sentence. *See* Ex. 179 at Shatsky-JD01144, Shatsky-JD01147, Shatsky-JD01151, Shatsky-JD01165.

418. Attached as Exhibit 180 is a true and correct copy of Prisoner Payment Records as to Ibrahim Abdullah that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00274 to Shatsky-JD00280, together with a certified translation of such records from Arabic into English.

419. Ibrahim Abdullah's Prisoner Payment Records reflect that Defendants made monthly payments to his beneficiary "Huriyya Atallah Amin Abdullah" between May 2020 and May 2021 totaling 89,247.50 shekels. *See* Ex. 180 at Shatsky-JD00280.

420. ***Munir Rajbi.*** "Munir Rajbi" pleaded guilty for his role in perpetrating the March 5, 2003 Attack that injured seven U.S. citizens (*see ¶ 213, supra*). *See* Kaufman Decl. ¶ 7.

421. Attached as Exhibit 181 is a true and correct copy of Prisoner File documents as to "Munir Farid Munir A-Rajbi" ("Rajbi") that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD01254 to Shatsky-JD01258, Shatsky-JD01261 to Shatsky-JD01264, and Shatsky-JD01266, together with a certified translation of documents bearing production numbers Shatsky-JD01256, Shatsky-JD01258, Shatsky-JD01262 to Shatsky-JD01264, and Shatsky-JD01266 from Arabic into English. Rajbi's Prisoner File reflects:

- a. The Commission's "Main Prisoner Form" stating that Rajbi was arrested on March 17, 2003 and was sentenced. *See* Ex. 181 at Shatsky-JD01258.
- b. Israeli court documents concerning the indictment of Rajbi for his role perpetrating the March 5, 2003 Attack. *See* Ex. 181 at Shatsky-JD01262-64.
- c. Certificates of The International Committee of the Red Cross, updated March 29, 2011, July 7, 2013, September 14, 2015, October 1, 2018, certifying that "Mounir Farid Mounir Rajabi" was arrested on March 17, 2003 and received a life sentence. *See* Ex. 181 at Shatsky-JD01254, Shatsky-JD01256-57, Shatsky-JD01261.

- d. Confirmation by the Commission, dated April 3, 2011, that Rajbi “is serving his sentence in the prisons of the occupation … and he is a security prisoner throughout the period of his arrest.” *See* Ex. 181 at Shatsky-JD01266.
- e. A “Power of Attorney,” dated August 12, 2013 and certified by the International Committee of the Red Cross on December 23, 2013, whereby prisoner “Mounir Farid Mounir Rajabi” provided authorization to “Saadah Farid Mounir Rajabi” (ID Number “^{Redacted}9263”). *See* Ex. 181 at Shatsky-JD01255.

422. Attached as Exhibit 182 is a true and correct copy of Prisoner Payment Records as to Rajbi that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00301 to Shatsky-JD00307, together with a certified translation of such records from Arabic into English.

423. Rajbi’s Prisoner Payment Records reflect that Defendants made monthly payments to his beneficiary “Sa’da Farid Munir Rajbi” (ID no. “^{Redacted}9263”) between May 2020 and May 2021 totaling 97,505 shekels. *See* Ex. 182 at Shatsky-JD00307.

424. ***Nasim Rashad Abd el-Wadud Za’tari.*** “Nasim Rashad Abd el-Wadud Za’tari” pleaded guilty for his role in perpetrating the August 19, 2003 Attack that injured seven U.S. citizens (*see ¶¶ 262-264, supra*). *See* Kaufman Decl. ¶ 7.

425. Attached as Exhibit 183 is a true and correct copy of Prisoner File documents as to “Nasim Rashed Abd el-Wudud Za’tari” (“Za’tari”) that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD01302 to Shatsky-JD01308 and Shatsky-JD01311 to Shatsky-JD01324, together with a certified translation of documents bearing production numbers Shatsky-JD01302, Shatsky-JD01304 to

Shatsky-JD01308, and Shatsky-JD01312 to Shatsky-JD01324 from Arabic into English.

Za'tari's Prisoner File reflects:

- a. The Commission's "Main Prisoner Form" stating that Za'tari was arrested on September 9, 2003 and received a "Life term" sentence. *See* Ex. 183 at Shatsky-JD01307.
- b. Israeli court documents concerning the indictment of Za'tari for his role perpetrating the August 19, 2003 Attack. Ex. 183 at Shatsky-JD01312-1324.
- c. Certificates of The International Committee of the Red Cross, updated March 15, 2011, August 13, 2013, December 13, 2015, October 4, 2017, and November 1, 2018 certifying that "Nassim Rashed Abdel Wedoud Zaatari" was arrested on September 9, 2003 and received a life sentence. *See* Ex. 183 at Shatsky-JD01303-1306, Shatsky-JD01311.
- d. That "Kifa Taj A-Din Abdel Haez Za'tari" is listed as Za'tari's "Authorized Representative (Beneficiary)" and mother. *See* Ex. 183 at Shatsky-JD01308.
- e. A "Special Power of Attorney" signed on November 13, 2017, whereby Za'tari authorized both his mother (ID number "^{Redacted}3061") and sister (Najwa Rashed 'Abd el-Wudud' Hilwani, ID number "^{Redacted}4571") to receive Za'tari's "monthly salary" and "monthly allowance ... and any additional amounts returned to me due to the progression of my term of incarceration only." *See* Ex. 183 at Shatsky-JD01302.

426. Attached as Exhibit 184 is a true and correct copy of Prisoner Payment Records as to Za'tari that Defendants produced in connection with jurisdictional discovery in this action,

bearing production numbers Shatsky-JD00333 to Shatsky-JD00340, together with a certified translation of such records from Arabic into English.

427. Za'tari's Prisoner Payment Records reflect that Defendants made monthly payments to his beneficiaries "Najwa Rashed Abd el-Wudud Hilwan" (ID no. "^{Redacted}4571") and "Kifa Taf A-Din Za'tari (ID no. "^{Redacted}3061") between May 2020 and May 2021 totaling 90,720 shekels. *See* Ex. 184 at Shatsky-JD00339-40.

428. ***Samir Zahir Ibrahim Kusa.*** "Samir Zahir Ibrahim Kusa" was convicted for his role in perpetrating the October 1, 2015 Attack in which a U.S. citizen was shot (*see* ¶ 354, *supra*). *See* Kaufman Decl. ¶ 8.

429. Attached as Exhibit 185 is a true and correct copy of Prisoner File documents as to "Samir Zuheir Ibrahim Kusa" ("Kusa") that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD01807 to Shatsky-JD01810, Shatsky-JD01812 to Shatsky-JD01813, and Shatsky-JD01817 to Shatsky-JD01828, together with a certified translation of documents bearing production numbers Shatsky-JD01813, and Shatsky-JD01817 to Shatsky-JD01828 from Arabic into English. Kusa's Prisoner File reflects:

- a. The Commission's "Main Prisoner Form" stating that Kusa was arrested on October 3, 2015. *See* Ex. 185 at Shatsky-JD01813.
- b. Israeli court documents concerning the indictment of Kusa for his role perpetrating the October 1, 2015 Attack. *See* Ex. 185 at Shatsky-JD01817-28.
- c. Certificates of The International Committee of the Red Cross, updated October 6, 2016, October 20, 2016, February 7, 2017, and February 11, 2019 certifying that

“Samir Zoheir Ibrahim Kousa” was arrested on October 3, 2015 and received a life sentence. *See* Ex. 185 at Shatsky-JD01807-1810, Shatsky-JD01812.

430. Attached as Exhibit 186 is a true and correct copy of Prisoner Payment Records as to Kusa that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00526, together with a certified translation of such records from Arabic into English.

431. Kusa’s Prisoner Payment Records reflect that Defendants made monthly payments to himself as his beneficiary (“Samir Zuheir Ibrahim Kusa”) between November 2020 and May 2021 totaling 14,918 shekels. *See* Ex. 186 at Shatsky-JD00526.

432. ***Suhib Jabara Ahmed Alfakiyah.*** “Suhib Jabara Ahmed Alfakiyah” was convicted for his role in perpetrating the July 1, 2016 Attack that killed or injured four U.S. citizens (*see* ¶ 363, *supra*). *See* Kaufman Decl. ¶ 8.

433. Attached as Exhibit 187 is a true and correct copy of Prisoner File documents as to “Suhib Jabara Ahmad Faqih” (“Faqih”) that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD01839 to Shatsky-JD01844, Shatsky-JD01847 to Shatsky-JD01848, and Shatsky-JD01851 to Shatsky-JD01856, together with a certified translation of documents bearing production numbers Shatsky-JD01840 to Shatsky-JD01844, Shatsky-JD01847 to Shatsky-JD01848, and Shatsky-JD01851 to Shatsky-JD01856 from Arabic into English. Faqih’s Prisoner File reflects:

- a. The Commission’s prisoner form stating that Faqih was arrested on July 4, 2016. *See* Ex. 187 at Shatsky-JD01847.
- b. Israeli court documents concerning the indictment of Faqih for his role perpetrating the July 1, 2016 Attack. *See* Ex. 187 at Shatsky-JD01851-1856.

- c. Israeli court documents concerning the sentencing of Faqih to 16 years in prison for his role perpetrating the July 1, 2016 Attack. *See* Ex. 187 at Shatsky-JD01840-1844.
- d. A certificate of The International Committee of the Red Cross, dated January 16, 2019, certifying that “Sohaib Jbarah Ahmad Faqih” was arrested on July 4, 2016 and received a sentence of 15 years, 11 months, and 28 days. *See* Ex. 187 at Shatsky-JD01839.
- e. That “Yusra Hasan Al-Faqih” is listed as Faqih’s “First Beneficiary” and mother. *See* Ex. 187 at Shatsky-JD01848.

434. Attached as Exhibit 188 is a true and correct copy of Prisoner Payment Records as to Faqih that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00531 to Shatsky-JD00532, together with a certified translation of such records from Arabic into English.

435. Faqih’s Prisoner Payment Records reflect that Defendants made monthly payments to his beneficiary “Yusra Hasan Muhammad Al-Faqih” between May 2020 and May 2021 totaling 26,800 shekels. *See* Ex. 188 at Shatsky-JD00532.

436. ***Munzar Mahmoud Khalil Noor.*** The following U.S. citizens received a judgment in *Sokolow v. Palestine Liberation Org.*, No. 04-cv-0397 (GBD), 2015 WL 10852003 (S.D.N.Y. Oct. 1, 2015) under 18 U.S.C. § 2333 stemming from injuries inflicted by an attack on January 27, 2002 in Jerusalem: Mark Sokolow, Elana Sokolow, Jamie Sokolow, Lauren Sokolow, Rena Sokolow. *See* *Sokolow*, 2015 WL 10852003 at *1.

437. “Munzar Mahmoud Khalil Noor” (“Noor”) was convicted for his role in perpetrating the attack. *See* Kaufman Decl. ¶ 8.

438. Attached as Exhibit 189 is a true and correct copy of Prisoner File documents as to Noor that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD01457 to Shatsky-JD01463, and Shatsky-JD01467, together with a certified translation of documents bearing production numbers Shatsky-JD01463 from Arabic into English. Noor's Prisoner File reflects:

- a. The Commission's "Main Prisoner Form" stating that Noor was arrested on April 17, 2002 and received a "Life term" sentence. *See* Ex. 189 at Shatsky-JD01463.
- b. Certificates of The International Committee of the Red Cross, updated March 17, 2011, May 6, 2012, July 5, 2012, May 4, 2015, February 28, 2016, and July 18, 2017 certifying that "Monzer Mahmoud Khalil Nour" was arrested on April 17, 2002 and received a life sentence. *See* Ex. 189 at Shatsky-JD01457, Shatsky-JD01459-1462, Shatsky-JD01467.
- c. A "Power of Attorney" dated March 13, 2016 whereby prisoner Noor authorized "Ibrahim Mahmoud Khalil Noor" (ID No. "^{Redacted}3628") "to receive my salary from prisoner committee." *See* Ex. 189 at Shatsky-JD01458.

439. Attached as Exhibit 190 is a true and correct copy of Prisoner Payment Records as to Noor that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00415 to Shatsky-JD00421, together with a certified translation of such records from Arabic into English.

440. Noor's Prisoner Payment Records reflect that Defendants made monthly payments to his beneficiary "Ibrahim Mahmoud Khalil Noor" (ID no. "^{Redacted}3628") between May 2020 and May 2021 totaling 89,200 shekels. *See* Ex. 190 at Shatsky-JD00421.

441. ***Akram Ibrahim Mahmoud Qawasme.*** “Akram Ibrahim Mahmoud Qawasme” pleaded guilty for his role in perpetrating the February 25, 1996 Attack in which three U.S. citizens were killed and one was injured (*see ¶¶ 207-208, supra*). *See* Kaufman Decl. ¶ 7.

442. Attached as Exhibit 191 is a true and correct copy of Prisoner File documents as to “Akram Ibrahim Mahmoud Al-Qawasme” (“Qawasme”) that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD01103 to Shatsky-JD01106 and Shatsky-JD01109, together with a certified translation of documents bearing production numbers Shatsky-JD01105 to Shatsky-JD01106 from Arabic into English. Qawasme’s Prisoner File reflects:

- a. The Commission’s “Main Prisoner Form” stating that Qawasme was arrested on March 28, 1996, and received a “life term” sentence. *See* Ex. 191 at Shatsky-JD01105.
- b. Certificates of The International Committee of the Red Cross, updated March 16, 2011, December 16, 2015, and December 30, 2018, certifying that “Akram Ibrahim Mahmoud Qawasme” received a life sentence. *See* Ex. 191 at Shatsky-JD01103, Shatsky-JD01104, Shatsky-JD01109.
- c. That “Maliha Mahmoud Isma’il Qawasme” is listed as Qawasme’s “Authorized Representative (Beneficiary)” and mother. *See* Ex. 191 at Shatsky-JD01106.

443. Attached as Exhibit 192 is a true and correct copy of Prisoner Payment Records as to “Akram Ibrahim Mahmoud Qawasme” that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00250 to Shatsky-JD00258, together with a certified translation of such records from Arabic into English.

444. Akram Ibrahim Mahmoud Qawasme's Prisoner Payment Records reflect that Defendants made monthly payments to Akram Ibrahim Mahmoud Qawasme's beneficiary "Maliha Mahmoud Isma'il Qawasme" between May 2020 and May 2021 totaling 113,995.16 shekels. Ex. 192 at Shatsky-JD00258.

445. ***Jamal Fatah Tzabich Al Hor.*** On June 9, 1996, U.S. citizen Yaron Ungar, his wife, and his 9-month-old son were traveling home from a wedding near Beit Shemesh when terrorists connected to Hamas "opened fire on the Ungars' car with two Kalashnikov machine guns," killing Yaron Ungar and his wife. *Estates of Ungar ex rel. Strachman v. Palestinian Authority*, 153 F. Supp. 2d 76, 82–83 (D.R.I. 2001). This declaration refers to the attack as the "June 9, 1996 Attack." This declaration refers to the attack as the "June 9, 1996 Attack."

446. "Jamal Fatah Tzabich Al Hor" was convicted for his role in perpetrating the June 9, 1996 Attack. *See* Kaufman Decl. ¶ 8.

447. Attached as Exhibit 193 is a true and correct copy of Prisoner File documents as to "Jamal Abd Al-Fatah Subeih Hur" ("Hur") that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD01421 to Shatsky-JD01422, Shatsky-JD01428 to Shatsky-JD01429, and Shatsky-JD01431, together with a certified translation of documents bearing production numbers Shatsky-JD01428 to Shatsky-JD01429 from Arabic into English. Hur's Prisoner File reflects:

- a. The Commission's "Main Prisoner Form" stating that Hur was arrested on November 13, 1997 and was sentenced. *See* Ex. 193 at Shatsky-JD01428.
- b. Certificates of The International Committee of the Red Cross, updated March 15, 2011, September 1, 2015, and August 28, 2018, certifying that "Jamal Abdel

Fattah Sabih Hour” was arrested on November 13, 1997 and received a life sentence. *See* Ex. 193 at Shatsky-JD01421-22, Shatsky-JD01431.

c. That “Halima Ahmad Naji Al-Hur” is listed as Hur’s “Authorized Representative (Beneficiary)” and wife. *See* Ex. 193 at Shatsky-JD01429.

448. Attached as Exhibit 194 is a true and correct copy of Prisoner Payment Records as to Hur that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00391 to Shatsky-JD00398, together with a certified translation of such records from Arabic into English.

449. Hur’s Prisoner Payment Records reflect that Defendants made monthly payments to Hur’s beneficiary “Halima Ahmad Naji Al-Hur” between May 2020 and May 2021 totaling 105,255 shekels. *See* Ex. 194 at Shatsky-JD00398.

450. ***Raid Fakhri Abu Hamadiyah.*** “Raid Fakhri Abu Hamadiyah” was convicted for his role in perpetrating the June 9, 1996 Attack that injured a U.S. citizen (*see ¶ 445, supra*). *See* Kaufman Decl. ¶ 8.

451. Attached as Exhibit 195 is a true and correct copy of Prisoner File documents as to “Raid Saleh Fakhri Abu Hamadiyah” (“Hamadiyah”) that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD01398 to Shatsky-JD01400, Shatsky-JD01402 to Shatsky-JD01403, Shatsky-JD01405 to Shatsky-JD01406, and Shatsky-JD01410, together with a certified translation of documents bearing production numbers Shatsky-JD01405 to Shatsky-JD01406 from Arabic into English. Hamadiyah’s Prisoner File reflects:

- a. The Commission’s “Main Prisoner Form” stating that Hamadiyah was arrested on April 3, 1997 and received a “Life term” sentence. *See* Ex. 195 at Shatsky-JD01405.
- b. Certificates of The International Committee of the Red Cross, updated May 18, 2009, May 24, 2011, July 25, 2012, October 8, 2014, September 2, 2019, and September 8, 2019 certifying that “Raed Saleh Fakhri Abu-Hamieh” was arrested on April 3, 1997 and received a life sentence. *See* Ex. 195 at Shatsky-JD01398-1400, Shatsky-JD01402-3, Shatsky-JD01410.
- c. That “Fatma Abd Al-Halim Abu Hamadiyah” is listed as Hamadiyah’s “Authorized Representative (Beneficiary)” and mother. *See* Ex. 195 at Shatsky-JD01406.

452. Attached as Exhibit 196 is a true and correct copy of Prisoner Payment Records as to Hamadiyah that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00383 to Shatsky-JD00390, together with a certified translation of such records from Arabic into English.

453. Hamadiyah’s Prisoner Payment Records reflect that Defendants made monthly payments to his beneficiary “Fatma Abd Al-Halim Abu Hamadiyah” between May 2020 and May 2021 totaling 113,170 shekels. *See* Ex. 196 at Shatsky-JD00389-90.

454. ***Abbas al-Sayed.*** “Abbas al-Sayed” was convicted for his role in perpetrating the March 27, 2002 Attack that injured two U.S. citizens (*see ¶¶ 95-96, supra*). *See* Kaufman Decl. ¶ 8.

455. Attached as Exhibit 197 is a true and correct copy of Prisoner File documents as to “Abbas Mohammed Mustafa Al-Sayed” (“Al-Sayed”) that Defendants produced in connection

with jurisdictional discovery in this action, bearing production numbers Shatsky-JD01506, Shatsky-JD01511, Shatsky-JD01513, Shatsky-JD01516, Shatsky-JD01520, Shatsky-JD01522 to Shatsky-JD01523, and Shatsky-JD01530, together with a certified translation of documents bearing production numbers Shatsky-JD01522 to Shatsky-JD01523 from Arabic into English.

Al-Sayed's Prisoner File reflects:

- a. The Commission's "Main Prisoner Form" stating that Al-Sayed was arrested on May 8, 2002 and received a "life term" sentence. *See* Ex. 197 at Shatsky-JD01522.
- b. Certificates of The International Committee of the Red Cross, updated July 26, 2010, March 9, 2011, September 4, 2012, December 16, 2014, April 29, 2019, and October 20, 2019, certifying that "Abbas Mohammad Mostafa Sayed" was arrested on May 8, 2002 and received a life sentence. *See* Ex. 197 at Shatsky-JD01506, Shatsky-JD01511, Shatsky-JD01513, Shatsky-JD01516, Shatsky-JD01520, Shatsky-JD01530.
- c. That Al-Sayed is listed as his own "Authorized Representative (Beneficiary)." *See* Ex. 197 at Shatsky-JD01523.

456. Attached as Exhibit 198 are true and correct copies of Prisoner Payment Records as to Al-Sayed that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00431 to Shatsky-JD00432, together with a certified translation of such records from Arabic into English.

457. Al-Sayed's Prisoner Payment Records reflect that Defendants made monthly payments to him between May 2020 and May 2021 totaling 27,347.93 shekels. *See* Ex. 198 at Shatsky-JD00534.

458. ***Abdallah Yihya Sharbati.*** “Abdallah Yihya Sharbati” pleaded guilty for his role in perpetrating the August 19, 2003 Attack that injured seven U.S. citizens (*see ¶¶ 262-264, supra*). *See* Kaufman Decl. ¶ 7.

459. Attached as Exhibit 199 is a true and correct copy of Prisoner File documents as to “Abdallah Adnan Yihya Sharbati” (“Sharbati”) that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD01326 to Shatsky-JD01334, together with a certified translation of documents bearing production numbers Shatsky-JD01328 and Shatsky-JD01333 to Shatsky-JD01334 from Arabic into English. Sharbati’s Prisoner File reflects:

- a. The Commission’s “Main Prisoner Form” stating that Sharbati was arrested on September 14, 2003, and received a “life term” sentence. *See* Ex. 199 at Shatsky-JD01333.
- b. Certificates of The International Committee of the Red Cross, updated March 22, 2011, September 18, 2013, March 10, 2015, April 8, 2015, January 3, 2016, and January 29, 2018, certifying that “Abdallah Adnan Yehya Sharbati” was arrested on September 14, 2003 and received a life sentence. *See* Ex. 199 at Shatsky-JD01326-27, Shatsky-JD01329-32.
- c. The Commission’s representation on October 2, 2013, that Sharbati was “still imprisoned in the occupation prisons,” and instructions “to pay [Sharbati] the ten-years increment.” *See* Ex. 199 at Shatsky-JD01328.
- d. That “Kawthar Abdel Jalil Sharbati” is listed as Sharbati’s “Authorized Representative (Beneficiary)” and mother. *See* Ex. 199 at Shatsky-JD01334.

460. Attached as Exhibit 200 are true and correct copies of Prisoner Payment Records as to Sharbati that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00341 to Shatsky-JD00347, together with a certified translation of such records from Arabic into English.

461. Sharbati's Prisoner Payment Records reflect that Defendants made monthly payments to Sharbati's beneficiary "Kawthar Abd Al-Jalil Sharbati" between May 2020 and May 2021 totaling 97,705 shekels. *See* Ex. 200 at Shatsky-JD00347.

462. **Abdullah Ghaleb Abdullah Barghouti.** "Abdullah Ghaleb Abdullah Barghouti" pleaded guilty for his role in perpetrating the July 31, 2002 Attack that injured thirteen U.S. citizens (*see ¶ 395, supra*). *See* Kaufman Decl. ¶ 7.

463. Attached as Exhibit 201 is a true and correct copy of Prisoner File documents as to "Abdullah Ghaleb Abdullah Jamal Al-Barghouti" ("Barghouti") that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD01888, Shatsky-JD01892 to Shatsky-JD01897, and Shatsky-JD01899, together with a certified translation of documents bearing production numbers Shatsky-JD01896 to Shatsky-JD01897 from Arabic into English. Barghouti's Prisoner File reflects:

- a. The Commission's "Main Prisoner Form" stating that Barghouti was arrested on March 5, 2003 and received a "life term" sentence. *See* Ex. 201 at Shatsky-JD01896.
- b. Certificates of The International Committee of the Red Cross, updated March 3, 2011, March 7, 2013, October 3, 2014, March 29, 2015, and August 7, 2017, certifying that "Abdallah Ghaleb Abdallah Jamal-Barghouthy" was arrested on

March 5, 2003 and received a life sentence. *See* Ex. 201 at Shatsky-JD01888, Shatsky-JD01892-1895, Shatsky-JD01899.

c. That “Faida Ali Abd Al-Jamal” is listed as Barghouti’s “Authorized Representative (Beneficiary)” and wife. *See* Ex. 201 at Shatsky-JD01897.

464. Attached as Exhibit 202 are true and correct copies of Prisoner Payment Records as to “Abdullah Ghaleb Abdullah Al-Jamal” that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD01900 to Shatsky-JD01907, together with a certified translation of such records from Arabic into English.

465. Abdullah Ghaleb Abdullah Al-Jamal’s Prisoner Payment Records reflect that Defendants made monthly payments to Abdullah Ghaleb Abdullah Al-Jamal’s beneficiary and wife “Faida Ali Abd Al-Jamal” between May 2020 and May 2021 totaling 98,534.20 shekels. *See* Ex. 202 at Shatsky-JD01907.

466. **Ahmad Khaled Dawud Hamed.** The following U.S. citizens received a judgment in the United States District Court for the Eastern District of New York under 18 U.S.C. § 2333 for injuries caused by an attack on June 20, 2003 in Israel: Eugene Goldstein, Lorraine Goldstein, Barbara Goldstein-Ingardia, Michael Goldstein, and Chana Freedman. *See* Stipulation to Enter Final Judgment, *Linde v. Arab Bank*, No. 06-cv-1623 (BMC) (PK) (E.D.N.Y. May 24, 2016), ECF No. 1098.

467. “Ahmad Khaled Dawud Hamed” pleaded guilty for his role in perpetrating the attack. *See* Kaufman Decl. ¶ 7.

468. Attached as Exhibit 203 is a true and correct copy of Prisoner File documents as to “Ahmad Khaled Dawud Hamed” (“Dawud Hamed”) that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD01292 to

Shatsky-JD01293, Shatsky-JD01295, Shatsky-JD01297, and Shatsky-JD01299, together with a certified translation of documents bearing production numbers Shatsky-JD01292 to Shatsky-JD01293 from Arabic into English. Dawud Hamed's Prisoner File reflects:

- a. The Commission's "Main Prisoner Form" stating that Dawud Hamed was arrested on December 20, 2003 and received a "life term" sentence. *See Ex. 203 at Shatsky-JD01292.*
- b. Certificates of The International Committee of the Red Cross, updated March 13, 2011, November 10, 2013, and January 18, 2017 certifying that "Ahmad Khaled Daoud Hamed" was arrested on December 20, 2003 and received a life sentence. *See Ex. 203 at Shatsky-JD01295, Shatsky-JD01297, Shatsky-JD01299.*
- c. That "Inas Riyad Taleb Hamed" is listed as Dawud Hamed's "Authorized Representative (Beneficiary)" and wife. *See Ex. 203 at Shatsky-JD01293.*

469. Attached as Exhibit 204 are true and correct copies of Prisoner Payment Records as to Dawud Hamed that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00324 to Shatsky-JD00332, together with a certified translation of such records from Arabic into English.

470. Dawud Hamed's Prisoner Payment Records reflect that Defendants made monthly payments to Dawud Hamed's beneficiaries "Inas Riyad Hamed" and "Al-Karamah Housing Cooperative for [last word cut off]" between May 2020 and May 2021 totaling 94,140 shekels. *See Ex. 204 at Shatsky-JD00332.*

471. ***Ahmed Hamad Rushdie Hadib and Tamar Rassem Salim Rimawi.*** "Ahmed Hamad Rushdie Hadib" and "Tamar Rassem Salim Rimawi" pleaded guilty for their roles in

perpetrating the March 24, 2002 Attack that killed a U.S. citizen (*see ¶ 334, supra*). *See* Kaufman Decl. ¶ 7.

472. Attached as Exhibit 205 is a true and correct copy of Prisoner File documents as to “Ahmad Hamed Rushdie Hadib” (“Hadib”) that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD01216, Shatsky-JD01218, Shatsky-JD01220 to Shatsky-JD01222, Shatsky-JD01225, Shatsky-JD01227 to Shatsky-JD01228, and Shatsky-JD01232, together with a certified translation of documents bearing production numbers Shatsky-JD01216, Shatsky-JD01222, and Shatsky-JD01227 from Arabic into English. Hadib’s Prisoner File reflects:

- a. The Commission’s “Main Prisoner Form” stating that Dawud Hamed was arrested on June 14, 2003 and received a sentence of 24 years, 11 months, and 30 days. *See* Ex. 205 at Shatsky-JD01222.
- b. Certificates of The International Committee of the Red Cross, updated March 13, 2011, May 19, 2011, November 26, 2012, December 2, 2015, October 29, 2017, and October 15, 2020, certifying that “Ahmad Hamed Roshdi Hdieb” was arrested on June 14, 2003 and received a sentence of 24 years, 11 months, and 30 days. *See* Ex. 205 at Shatsky-JD01218, Shatsky-JD01220-21, Shatsky-JD01225, Shatsky-JD01228, Shatsky-JD01232.
- c. A “Special Power of Attorney” issued on July 27, 2017 whereby “grantor-prisoner” “Ahmed Hamed Rushdi Hadib” authorized and appointed his sister “Lubna Hamed Rushdi Hadib” (Identification No. “^{Redacted} 5079”) to receive his “allowance or any other sums I am eligible to.” *See* Ex. 205 at Shatsky-JD01216, Shatsky-JD01227.

473. Attached as Exhibit 206 are true and correct copies of Prisoner Payment Records as to Hadib that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00009 to Shatsky-JD00010, together with a certified translation of such records from Arabic into English.

474. Hadib's Prisoner Payment Records reflect that Defendants made monthly payments to his beneficiary "Lubna Hamad Hadib" between May 2020 and February 2021 totaling 68,800 shekels. *See* Ex. 206 at Shatsky-JD00010.

475. Attached as Exhibit 207 is a true and correct copy of Prisoner File documents as to "Tamer Rassem Salim Al-Rimawi" ("Ramawi") that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD01182 to Shatsky-JD01186 and Shatsky-JD01188 to Shatsky-JD01189, together with a certified translation of documents bearing production numbers Shatsky-JD01182 from Arabic into English. Ramawi's Prisoner File reflects:

- a. Certificates of The International Committee of the Red Cross, updated December 2, 2012, June 9, 2013, February 17, 2015, and December 16, 2019 certifying that "Tamer Rassem Salim Rimawi" was arrested on May 28, 2003 and received a life sentence. *See* Ex. 207 at Shatsky-JD01183-1186, Shatsky-JD01188-1189.
- b. A "special Power of Attorney" dated March 8, 2020 whereby the prisoner Rimawi appointed and empowered his sister "Haya Rassem Salim Al-Rimawi" (Identification No. "^{Redacted}0701") to receive Rimawi's allowance sums. *See* Ex. 207 at Shatsky-JD01182.

476. Attached as Exhibit 208 are true and correct copies of Prisoner Payment Records as to Rimawi that Defendants produced in connection with jurisdictional discovery in this action,

bearing production numbers Shatsky-JD00285 to Shatsky-JD00291, together with a certified translation of such records from Arabic into English.

477. Rimawi's Prisoner Payment Records reflect that Defendants made monthly payments to Dawud Hamed's beneficiary "Haya Rassem Salim Al-Rimawi" (Identification No. ^{“Redacted}0701") between May 2020 and May 2021 totaling 89,200 shekels. *See* Ex. 208 at Shatsky-JD00290-91.

478. ***Ali Mohamed Abu-Haliel.*** "Ali Mohamed Abu-Haliel" was convicted for his role in perpetrating the January 29, 2004 Attack that injured eight U.S. citizens (*see ¶ 118, supra*). *See* Kaufman Decl. ¶ 8.

479. Attached as Exhibit 209 is a true and correct copy of Prisoner File documents as to "Ali Mohamed Hammad Haliel" ("Haliel") that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD01689 to Shatsky-JD01690 and Shatsky-JD01692 to Shatsky-JD01697, together with a certified translation of the document bearing the production number Shatsky-JD01697 from Arabic into English. Haliel's Prisoner File reflects:

- a. The Commission's "Main Prisoner Form" stating that Haliel was arrested on March 6, 2004 and received a "life term" sentence. *See* Ex. 209 at Shatsky-JD01697.
- b. Certificates of The International Committee of the Red Cross, updated September 2, 2010, September 5, 2013, February 25, 2014, August 19, 2015, March 14, 2017, and July 31, 2019, certifying that "Ali Mohammad Hammad Hlayel" was arrested on March 6, 2004 and received a life sentence. *See* Ex. 209 at Shatsky-JD01689, Shatsky-JD01692-1696.

c. A “Power of Attorney” dated July 14, 2019 whereby “Ali Mohammad Hammad Helayel” authorized “randa Mohammad Hammad Joaabeh” (Identification No. ^{“Redacted”}0695”) to receive his “allocations from the committie [sic] of freed detainees and transfer it ti [sic] her account.” *See* Ex. 209 at Shatsky-JD01690.

480. Attached as Exhibit 210 are true and correct copies of Prisoner Payment Records as to Haliel that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00496 to Shatsky-JD00502, together with a certified translation of such records from Arabic into English.

481. Haliel’s Prisoner Payment Records reflect that Defendants made monthly payments to his beneficiary “[First name illegible] Muhammad Hammad Ju’ba,” (Identification No. ^{“Redacted”}0695”) between May 2020 and May 2021 totaling 89,200 shekels. *See* Ex. 210 at Shatsky-JD00501-2.

482. ***Bilal Yaqub Ahmed Barghouti.*** “Bilal Yaqub Ahmed Barghouti” pleaded guilty for his role in perpetrating the August 9, 2001 Attack that injured or killed twelve U.S. citizens (*see ¶¶ 66-67, supra*). *See* Kaufman Decl. ¶ 7.

483. Attached as Exhibit 211 is a true and correct copy of Prisoner File documents as to “Bilal Ya’qub Ahmad Barghouti Othman” (“Ahmad Barghouti”) that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD02017 to Shatsky-JD02019, Shatsky-JD02021 to Shatsky-JD02023, and Shatsky-JD02025, together with a certified translation of documents bearing production numbers Shatsky-JD02022 to Shatsky-JD02023 from Arabic into English. Ahmad Barghouti’s Prisoner File reflects:

- a. The Commission’s “Main Prisoner Form” stating that Ahmad Barghouti was arrested on April 2, 2002 and received a “life term” sentence. *See* Ex. 211 at Shatsky-JD02022.
- b. Certificates of The International Committee of the Red Cross, updated December 14, 2010, November 22, 2011, March 27, 2012, March 28, 2015, and July 25, 2017, certifying that “Bilal Yaaqoub Ahmad Barghouti Othman” was arrested on April 2, 2002 and received a life sentence. *See* Ex. 211 at Shatsky-JD02017-19, Shatsky-JD02021, Shatsky-JD02025.
- c. That “Hana Nimr Ahmad Al-Hudali” is listed as Ahmad Barghouti’s “Authorized Representative (Beneficiary)” and mother. *See* Ex. 211 at Shatsky-JD02023.

484. Attached as Exhibit 212 are true and correct copies of Prisoner Payment Records as to “Bilal Ya’qub Ahmad Dar Othman” that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD02009 to Shatsky-JD02015, together with a certified translation of such records from Arabic into English.

485. “Bilal Ya’qub Ahmad Dar Othman’s” Prisoner Payment Records reflect that Defendants made monthly payments to his beneficiary “Hana Nimr Ahmad Al-Hudali” between May 2020 and May 2021 totaling 89,200 shekels. *See* Ex. 212 at Shatsky-JD02014-15.

486. ***Fahmi Id Ramadan Mashahara.*** On June 18, 2002, a suicide terrorist connected to Hamas boarded the Egged Bus No. 32 near Gilo and detonated an explosive device, killing 19 and injuring 50. *See* Ex. *Suicide Terrorists in the Current Conflict*, ISRAELI SECURITY AGENCY at 8 (a copy of the relevant sections of the translated report is attached as Exhibit 44); Declaration of Itzhak Ilan 1–3, *Shatsky v. Syrian Arab Republic*, No. 08-cv-0496 (RJL) (D.D.C. Sept. 15, 2020), ECF No. 50-1.

487. As a result of the attack, the following U.S. citizens were killed or injured: Moshe Gottlieb, Sheila Gottlieb, Seymour Gottlieb, Faye Chana Benjaminson, and Gila Aluf. Based on their injuries, the above-named victims brought federal actions under 18 U.S.C. § 2333 and other statutes against Arab Bank, PLC. *See Second Amended Complaint, Litle v. Arab Bank, PLC*, No. 04-cv-5449 (NG) (VP) (E.D.N.Y. Apr. 10, 2007), ECF No. 307; Complaint, *Coulter v. Arab Bank, PLC*, No. 05-cv-0365 (E.D.N.Y. Jan. 21, 2005), ECF No. 1. *See also* Kaufman Decl. ¶ 11 (discussing court documents that note Moshe Gottlieb as a victim in this attack). The complaints, signed by attorneys Mark S. Werbner of Sayles Werbner P.C. and Gary M. Osen of Osen & Associate, LLC, state that the above-named victims were U.S. citizens. *See Second Amended Complaint* at 16-17, 107; Complaint at 69, 109.

488. “Fahmi Id Ramdan Mashahara” was convicted for his role in perpetrating the attack. *See* Kaufman Decl. ¶ 8.

489. Attached as Exhibit 213 is a true and correct copy of Prisoner File documents as to “Fahmi Abd Ramadan Mushahara” (“Mushahara”) that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD01533 to Shatsky-JD01536, Shatsky-JD01539, Shatsky-JD01541 to Shatsky-JD01543, Shatsky-JD01546, and Shatsky-JD01548, together with a certified translation of documents bearing production numbers Shatsky-JD01533, Shatsky-JD01535, and Shatsky-JD01542 to Shatsky-JD01543 from Arabic into English. Mushahara’s Prisoner File reflects:

- a. The Commission’s “Main Prisoner Form” stating that Mushahara was arrested on September 4, 2002 and received a “life term” sentence. *See* Ex. 213 at Shatsky-JD01542.

- b. Certificates of The International Committee of the Red Cross, updated March 21, 2011, December 5, 2012, March 17, 2014, October 31, 2016, November 7, 2017, and December 12, 2018, certifying that “Fahmi Eid Ramadan Mashahreh” was arrested on September 4, 2002 and received a life sentence. *See* Ex. 213 at Shatsky-JD01534, Shatsky-JD01536, Shatsky-JD01539, Shatsky-JD01541, Shatsky-JD01546, Shatsky-JD01548.
- c. Confirmation by the Commission dated December 18, 2018 that Mushahara was arrested on September 4, 2002 and “is sentenced to life imprisonment.” *See* Ex. 213 at Shatsky-JD01533.
- d. Confirmation by the Commission, dated November 8, 2017, that Mushahara’s wife “received all the Arrest Payments” and instructions to disburse “her with the Wife Increment, because her husband is a prisoner.” *See* Ex. 213 at Shatsky-JD01535.
- e. That “Samiya Musa Mashhur Mushahara” is listed as Mushahara’s “Authorized Representative (Beneficiary)” and wife. *See* Ex. 213 at Shatsky-JD01543.

490. Attached as Exhibit 214 are true and correct copies of Prisoner Payment Records as to Mushahara that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00433 to Shatsky-JD00441, together with a certified translation of such records from Arabic into English.

491. Mushahara’s Prisoner Payment Records reflect that Defendants made monthly payments to his beneficiary “Samiya Mussa Mash’hur Mushahara” between May 2020 and May 2021 totaling 103,290.95 shekels. *See* Ex. 214 at Shatsky-JD00440-41.

492. ***Hassan Abdel Rahman Hassan Salameh.*** “Hassan Abdel Rahman Hassan Salameh” (“Hassan Salameh”) was convicted for his role in perpetrating the February 25, 1996 Attack in which three U.S. citizens were killed and one U.S. citizen was injured (see ¶¶ 207-208, *supra*). *See* Kaufman Decl. ¶ 8.

493. Attached as Exhibit 215 is a true and correct copy of Prisoner File documents as to Hassan Salameh that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD01377 to Shatsky-JD01378, Shatsky-JD01385, Shatsky-JD01390 to Shatsky-JD01394, and Shatsky-JD01396, together with a certified translation of documents bearing production numbers Shatsky-JD01378, Shatsky-JD01390 to Shatsky-JD01392 and Shatsky-JD01394 from Arabic into English. Hassan Salameh’s Prisoner File reflects:

- a. Certificates of The International Committee of the Red Cross, updated March 29, 2011, December 1, 2011, December 12, 2011, February [illegible], 2014, March 24, 2015, and May 18, 2016, certifying that Hassan Salameh was arrested on May 17, 1996 and received a sentence of 99 years. *See* Ex. 215 at Shatsky-JD01377-78, Shatsky-JD01385, Shatsky-JD01390, Shatsky-JD01393-94, Shatsky-JD01396.
- b. Hassan Salameh’s “Prisoner Confirmation of the Selection and Appointment of His Special Representative for Receiving His Monthly Allowance from the Ministry of Detainees & Ex-Detainees,” issued and signed on January 12, 2012, whereby Hassan Salameh appointed his wife “Ghafran Alian Sa’ad Salameh” to receive his “monthly allowance.” *See* Ex. 215 at Shatsky-JD01391. *See also id.* at Shatsky-JD01392 (Hassan Salameh’s executed “Special Power of attorney”

authorizing and appointing his wife (Identification No. “^{Redacted}6422”) “to receive my entire allowance” or “any sums I am entitled to … from the Ministry of Detainees & Ex-Detainees Affairs…”).

494. Attached as Exhibit 216 is a true and correct copy of Prisoner Payment Records as to Hassan Salameh that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00374 to Shatsky-JD00382, together with a certified translation of such records from Arabic into English.

495. Defendants redacted information concerning payments made to Hassan Salameh’s beneficiary, except for one entry dated May 2021 reflecting a payment of 9,882.50 shekels to Hassan Salameh’s beneficiary with the same Identification Number as Hassan Salameh’s wife. *See* Ex. 216 at Shatsky-JD00382.

496. ***Ibrahim Adnan Najib Abdel Hai.*** “Ibrahim Adnan Najib Abdel Hai” (“Abdel Hai”) pleaded guilty for his role in perpetrating the January 22, 2002 Attack that injured seven U.S. citizens (*see* ¶ 280, *supra*). *See* Kaufman Decl. ¶ 7.

497. Attached as Exhibit 217 is a true and correct copy of Prisoner File documents as to Abdel Hai that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD01168 to Shatsky-JD01170 and Shatsky-JD01172 to Shatsky-JD01173, together with a certified translation of documents bearing production numbers Shatsky-JD01169 to Shatsky-JD01170 and Shatsky-JD01173 from Arabic into English. Abdel Hai’s Prisoner File reflects:

- a. The Commission’s “Main Prisoner Form” stating that Abdel Hai was arrested on June 3, 2002 and received a “life tern[sic]” sentence. *See* Ex. 217 at Shatsky-JD01169.

- b. Certificates of The International Committee of the Red Cross, updated March 29, 2011 and May 27, 2012, certifying that “Ibrahim Adnan Najib Abdel Hay” was arrested on June 3, 2002 and received a life sentence imprisonment. *See* Ex. 217 at Shatsky-JD01168, Shatsky-JD01172.
- c. Confirmation by the Commission dated March 20, 2011 that Abdel Hai “is detained in the Israeli occupation prisons on account of his national struggle, and he had been a security prisoner throughout his incarceration period.” *See* Ex. 217 at Shatsky-JD01173.
- d. That Abdel Hai himself is listed as Abdel Hai’s “Authorized Representative (Beneficiary).” *See* Ex. 217 at Shatsky-JD01170.

498. Attached as Exhibit 218 is a true and correct copy of Prisoner Payment Records as to “Ibrahim Adnan Najib Abdel Hai” that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00281 to Shatsky-JD00282, together with a certified translation of such records from Arabic into English.

499. “Ibrahim Adnan Najib Abdel Hai’s” Prisoner Payment Records reflect that Defendants made monthly payments to himself as his own beneficiary between May 2020 and May 2021 totaling 42,989.93 shekels. *See* Ex. 218 at Shatsky-JD00281-82.

500. ***Ibrahim Yusuf Ibrahim Atiya.*** “On June 17, 2003, the Leibovitch family was traveling along the Trans-Israel Highway, just west of the town of Kalkilya, Israel. Members of the Palestine Islamic Jihad [] terrorist organization opened fire with Kalashnikov machine guns and pistols on the family’s Mazda mini-van,” severely injuring U.S. citizen Shira Leibovitch. *Leibovitch v. Syrian Arab Republic*, No. 08 C 1939, 2011 WL 444762, at *1 (N.D. Ill. Feb. 1,

2011), *rev'd on other grounds sub nom. Leibovitch v. Islamic Republic of Iran*, 697 F.3d 561 (7th Cir. 2012). This declaration refers to the attack as the “June 17, 2003 Attack.”

501. “Ibrahim Yusuf Ibrahim Atiya” (“Ibrahim Atiya”) was convicted for his role in perpetrating the June 17, 2003 Attack. *See* Kaufman Decl. ¶ 8.

502. Attached as Exhibit 219 is a true and correct copy of Prisoner File documents as to Ibrahim Atiya that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD01641, Shatsky-JD01643, Shatsky-JD01645 to Shatsky-JD01648, Shatsky-JD01652, and Shatsky-JD01658, together with a certified translation of documents bearing production numbers Shatsky-JD01641 and Shatsky-JD01652 from Arabic into English. Ibrahim Atiya’s Prisoner File reflects:

- a. The Commission’s “Main Prisoner Form” stating that Ibrahim Atiya was arrested on September 15, 2003 and received a “life term” sentence. *See* Ex. 219 at Shatsky-JD01652.
- b. Certificates of The International Committee of the Red Cross, updated March 8, 2011, October 9, 2011, August 29, 2013, November 14, 2013, October 11, 2015, and August 16, 2018, certifying that “Ibrahim Youssef Ibrahim Atieh” was arrested on September 15, 2003 and received a life sentence. *See* Ex. 219 at Shatsky-JD01643, Shatsky-JD01645, Shatsky-JD01646-1648, Shatsky-JD01658.
- c. A “Renewal of Power of Attorney” stating prisoner Ibrahim Atiya’s “allowance is delivered to the account of his sister, “Shuruq Yusuf Ibrahim Harisi” (ID card number “^{Redacted} 1274”), and that the power of attorney has been renewed on May 22, 2018. *See* Ex. 219 at Shatsky-JD01641.

503. Attached as Exhibit 220 is a true and correct copy of Prisoner Payment Records Ibrahim Atiya that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00481 to Shatsky-JD00486, together with a certified translation of such records from Arabic into English.

504. Ibrahim Atiya's Prisoner Payment Records reflect that Defendants made monthly payments to Ibrahim Atiya's beneficiary "Shurouq Yousuf Ibrahim Al-Harisi," ID number ^{“Redacted} 1274, between May 2020 and May 2021 totaling 89,200 shekels. *See* Ex. 220 at Shatsky-JD00486.

505. ***Mohammed Mustafa Mohammed Abu Dura.*** "Mohammed Mustafa Mohammed Abu Dura" was convicted for his role in perpetrating the June 17, 2003 Attack that injured one U.S. citizen (*see ¶ 500, supra*). *See* Kaufman Decl. ¶ 8.

506. Attached as Exhibit 221 is a true and correct copy of Prisoner File documents as to "Mohammed Mustafa Mohammed Dura" ("Dura") that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD01626 to Shatsky-JD01631, Shatsky-JD01633 to Shatsky-JD01634, and Shatsky-JD01639, together with a certified translation of documents bearing production numbers Shatsky-JD01633 to Shatsky-JD01634 from Arabic into English. Dura's Prisoner File reflects:

- a. The Commission's "Main Prisoner Form" stating that Dura was arrested on September 15, 2003 and received a "Life term" sentence. *See* Ex. 221 at Shatsky-JD01633.
- b. Certificates of The International Committee of the Red Cross, updated August 2, 2010, February 14, 2011, March 7, 2011, September 15, 2013, December 6, 2014, and December 5, 2016, certifying that "Mohammad Mostafa Mohammad Dorra"

was arrested on September 9, 2003 and received a life sentence. *See* Ex. 221 at Shatsky-JD01626-1631, Shatsky-JD01639.

c. That “Wafa Mustafa Abdel Hafiz Dura” is listed as Dura’s “Authorized Representative (Beneficiary)” and mother. *See* Ex. 221 at Shatsky-JD01634.

507. Attached as Exhibit 222 is a true and correct copy of Prisoner Payment Records as to Dura that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00474 to Shatsky-JD00480, together with a certified translation of such records from Arabic into English.

508. Dura’s Prisoner Payment Records reflect that Defendants made monthly payments to his beneficiary “Wafa Mustafa Dura” between May 2020 and May 2021 totaling 89,200 shekels. *See* Ex. 222 at Shatsky-JD00479-80.

509. ***Muayad Hamad.*** U.S. citizens Jacob Steinmetz and Deborah Steinmetz were injured in a terrorist attack on January 29, 2003, when two masked men shot at their car as they were driving on Route 60 in Israel. *See Weiss v. Nat'l Westminster Bank PLC*, 453 F. Supp.2d 609, 620 (E.D.N.Y. 2006); Kaufman Decl. ¶ 11 (discussing court documents that note Jacob Steinmetz as a victim in this attack).

510. “Muayad Hamad” was convicted for his role in perpetrating the attack. *See* Kaufman Decl. ¶ 8.

511. Attached as Exhibit 223 is a true and correct copy of Prisoner File documents as to “Muayad Shukri Abd Al-Hamid Hamad” (“Muayad Hamad”) that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD01612, Shatsky-JD01614 to Shatsky-JD01616, Shatsky-JD01618 to Shatsky-JD01619, and Shatsky-JD01621, together with a certified translation of documents bearing production numbers

Shatsky-JD01618 to Shatsky-JD01619 from Arabic into English. Muayad Hamad's Prisoner File reflects:

- a. The Commission's "Main Prisoner Form" stating that Muayad Hamad was arrested on December 20, 2003 and received a "Life term" sentence. *See* Ex. 223 at Shatsky-JD01618.
- b. Certificates of The International Committee of the Red Cross, updated July 5, 2010, March 13, 2011, August 5, 2013, and October 7, 2015, certifying that "Moayed Shokri Abdel Hamid Hammad" was arrested on December 20, 2003 and received a life sentence. *See* Ex. 223 at Shatsky-JD01612, Shatsky-JD01614-1616, Shatsky-JD01621.
- c. That "Wurud Hassan Isma'il Hamad" is listed as Muayad Hamad's "Authorized Representative (Beneficiary)" and wife. *See* Ex. 223 at Shatsky-JD01619.

512. Attached as Exhibit 224 is a true and correct copy of Prisoner Payment Records as to Muayad Hamad that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00466 to Shatsky-JD00473, together with a certified translation of such records from Arabic into English.

513. Muayad Hamad's Prisoner Payment Records reflect that Defendants made monthly payments to his beneficiary "Wurud Hasan Isma'il Hamad" between May 2020 and May 2021 totaling 93,617.50 shekels. *See* Ex. 224 at Shatsky-JD00472-73.

514. ***Mohamed Abdel Rahman Salem Mousleh.*** "Mohamed Abdel Rahman Salem Mousleh" ("Mousleh") pleaded guilty for his role in perpetrating the January 22, 2002 Attack that injured seven U.S. citizens (*see ¶ 280, supra*). *See* Kaufman Decl. ¶ 7.

515. Attached as Exhibit 225 is a true and correct copy of Prisoner File documents as to Mousleh that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD01176 to Shatsky-JD01177, together with a certified translation of documents bearing production numbers Shatsky-JD01176 to Shatsky-JD01177 from Arabic into English. Mousleh's Prisoner File reflects:

- a. The Commission's "Main Prisoner Form" stating that Mousleh was arrested on February 17, 2002 and received a "Life term" sentence. *See* Ex. 225 at Shatsky-JD01176.
- b. That "[t]he prisoner himself" is listed as Mousleh's "Authorized Representative (Beneficiary)." *See* Ex. 225 at Shatsky-JD01177.

516. Attached as Exhibit 226 is a true and correct copy of Prisoner Payment Records as to Mousleh that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00283 to Shatsky-JD00284, together with a certified translation of such records from Arabic into English.

517. Mousleh's Prisoner Payment Records reflect that Defendants made monthly payments to Mousleh as his own beneficiary between May 2020 and May 2021 totaling 16,572.14 shekels. *See* Ex. 226 at Shatsky-JD00283-84.

518. ***Mohammed Arman.*** "Mohammed Arman" was convicted for his role in perpetrating the July 31, 2002 Attack that injured twelve U.S. citizens, and was paid by Defendants by reason of his imprisonment (*see ¶ 395, supra*). *See* Plaintiffs' Trial Exhibits 39, 72, 1035, 1120, *Sokolow v. Palestine Liberation Org.*, No 04-cv-0397 (S.D.N.Y. 2015), ECF Nos. 927-20, 927-35, 927-97, 910-53.

519. Attached as Exhibit 227 is a true and correct copy of Prisoner File documents as to “Mohammed Hasan Ahmad Arman” (“Arman”) that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD01594 to Shatsky-JD01597, Shatsky-JD01599 to Shatsky-JD01600, and Shatsky-JD01602, together with a certified translation of documents bearing production numbers Shatsky-JD01595, and Shatsky-JD01599 to Shatsky-JD01600 from Arabic into English. Arman’s Prisoner File reflects:

- a. The Commission’s “Main Prisoner Form” stating that Arman was arrested on August 18, 2002 and received a “Life term” sentence. *See* Ex. 227 at Shatsky-JD01599.
- b. Certificates of The International Committee of the Red Cross, updated March 22, 2011, November 27, 2011, August 27, 2015, and June 27, 2019, certifying that “Mohammad Hassan Ahmad Erman” was arrested on August 18, 2002 and received a life sentence. *See* Ex. 227 at Shatsky-JD01594, Shatsky-JD01596-97, Shatsky-JD01602.
- c. That “Linda Khadr Abdel Jalil Arman” is listed as Arman’s “Authorized Representative (Beneficiary)” and wife. *See* Ex. 227 at Shatsky-JD01600.
- d. The Commission’s assertion, dated January 21, 2009, that “prisoner” Arman’s wife, Linda Khadr Abd Al-Jalil Arman “received a monthly allowance of [Redacted] because he is incarcerated.” *See* Ex. 227 at Shatsky-JD01595.

520. Attached as Exhibit 228 is a true and correct copy of Prisoner Payment Records as to Arman that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00450 to Shatsky-JD00457, together with a certified translation of such records from Arabic into English.

521. Arman's Prisoner Payment Records reflect that Defendants made monthly payments to his beneficiary "Linda Khadr Abd Al-Jalil Arman" between May 2020 and May 2021 totaling 99,143.33 shekels. *See* Ex. 228 at Shatsky-JD00457.

522. ***Mohamed Ma'ali.*** "Mohamed Ma'ali" pleaded guilty for his role in perpetrating the January 29, 2004 Attack that injured eight U.S. citizens (*see* ¶ 118, *supra*). *See* Kaufman Decl. ¶ 7.

523. Attached as Exhibit 229 is a true and correct copy of Prisoner File documents as to "Mohammed Issa Mohammed Ma'ali" ("Ma'ali") that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD01339 to Shatsky-JD01344 and Shatsky-JD01346, together with a certified translation of documents bearing production numbers Shatsky-JD01343 to Shatsky-JD01344 from Arabic into English. Ma'ali's Prisoner File reflects:

- a. The Commission's "Main Prisoner Form" stating that Ma'ali was arrested on March 29, 2004 and received a "Life term" sentence. *See* Ex. 229 at Shatsky-JD01343.
- b. Certificates of The International Committee of the Red Cross, updated September 2, 2010, March 30, 2011, March 23, 2014, and August 19, 2015 certifying that "Mohammad Issa Mohammad Maali" was arrested on March 29, 2004 and received a life sentence. *See* Ex. 229 at Shatsky-JD01339-1342, Shatsky-JD01346.
- c. That "Su'ad Mohammed Ahmad Ma'ali" is listed as Ma'ali's "Authorized Representative (Beneficiary)" and mother. Ex. 229 at Shatsky-JD01344.

524. Attached as Exhibit 230 is a true and correct copy of Prisoner Payment Records as to Ma’ali that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00348 to Shatsky-JD00354, together with a certified translation of such records from Arabic into English.

525. Ma’ali’s Prisoner Payment Records reflect that Defendants made monthly payments to his beneficiary “Su’ad Mohammed Ahmad Ma’ali” between May 2020 and May 2021 totaling 89,200 shekels. *See* Ex. 230 at Shatsky-JD00353-54.

526. ***Nasser Jamal Mussa Shawish.*** “Nasser Jamal Mussa Shawish” (“Shawish”) was convicted for his role in perpetrating the March 21, 2002 Attack that injured five U.S. citizens (*see* ¶ 218, *supra*). *See* Kaufman Decl. ¶ 8.

527. Attached as Exhibit 231 is a true and correct copy of Prisoner File documents as to Shawish that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD01469 to Shatsky-JD01470, Shatsky-JD01472, Shatsky-JD01474 to Shatsky-JD01476, Shatsky-JD01480, Shatsky-JD01482 to Shatsky-JD01483, Shatsky-JD01487, Shatsky-JD01490 to Shatsky-JD01491, Shatsky-JD01498 and Shatsky-JD01501, together with a certified translation of documents bearing production numbers Shatsky-JD01490 to Shatsky-JD01491 and Shatsky-JD01498 from Arabic into English.

Shawish’s Prisoner File reflects:

- a. “Main Prisoner Forms” stating that Shawish was arrested on June 3, 2002 and on March 10, 2003, and received “Life term” sentences. *See* Ex. 231 at Shatsky-JD01491, Shatsky-JD01498.
- b. Certificates of The International Committee of the Red Cross, updated April 12, 2011, June 7, 2011, January 3, 2012, November 3, 2013, August 17, 2015,

October 12, 2016, December 20, 2018, certifying that “Nasser Jamal Moussa Shawish” was arrested on June 3, 2002 and received a life sentence. *See* Ex. 231 at Shatsky-JD01469-70, Shatsky-JD01474-1476, Shatsky-JD01483, Shatsky-JD01501.

- c. Certificates of The International Committee of the Red Cross, updated August 23, 2010, March 13, 2011, August 2, 2011, certifying that “Nasser Jamal Moussa Shawish” was arrested on March 3, 2003 and received a life sentence. *See* Ex. 231 at Shatsky-JD01480, Shatsky-JD01482, Shatsky-JD01487.
- d. Confirmation dated March 13, 2011 that prisoner Shawish “is detained in the prisons of the Israeli occupation … is a security prisoner and [] still detained.” Ex. 231 at Shatsky-JD01490.
- e. A “Power of Attorney dated March 19, 2018 whereby “Nasser Jamal Moussa Shawish” provided authority to “Intisar Jamal Moussa Shawish.” Ex. 231 at Shatsky-JD01472.

528. Attached as Exhibit 232 is a true and correct copy of Prisoner Payment Records as to Shawish that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00422 to Shatsky-JD00430, together with a certified translation of such records from Arabic into English.

529. Shawish’s Prisoner Payment Records reflect that Defendants made monthly payments to his beneficiaries “Intisar Jamal Shawish” and “Nablus Shari’ah Court’s Bailiff Office” between May 2020 and May 2021 totaling 89,200 shekels. *See* Ex. 232 at Shatsky-JD00429-30.

530. ***Omar Salah Sharif.*** “Omar Salah Sharif” pleaded guilty for his role in perpetrating the June 11, 2003 Attack that injured nine U.S. citizens (*see ¶¶ 36-37, supra*). *See* Kaufman Decl. ¶ 7.

531. Attached as Exhibit 233 is a true and correct copy of Prisoner File documents as to “Omar Saleh Muhammad Faiq Sharif” (“Omar Sharif”) that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD01280 to Shatsky-JD01283, Shatsky-JD01285 to Shatsky-JD01286, and Shatsky-JD01290, together with a certified translation of the document bearing the production number Shatsky-JD01286 from Arabic into English. Omar Sharif’s Prisoner File reflects:

- a. The Commission’s “Main Prisoner Form” stating that Omar Sharif was arrested on June 19, 2003 and received a “Life term” sentence. *See* Ex. 233 at Shatsky-JD01286.
- b. Certificates of The International Committee of the Red Cross, updated March 16, 2011, December 1, 2013, August 2, 2015, February 16, 2016, and December 27, 2017 certifying that “Omar Saleh Mohammad Faeq Sharif” was arrested on June 19, 2003 and received a life sentence. *See* Ex. 233 at Shatsky-JD01280, Shatsky-JD01282-83, Shatsky-JD01285, Shatsky-JD01290.
- c. A “Power of Attorney,” dated February 12, 2015, whereby “Omar Saleh Mohammed Faeq Sharif” provided authorization to “Amer Saleh Mohammad Faeq Sharif” (Identification No. ^{“Redacted”} 2114”). *See* Ex. 233 at Shatsky-JD01281.

532. Attached as Exhibit 234 is a true and correct copy of Prisoner Payment Records as to Omar Sharif that Defendants produced in connection with jurisdictional discovery in this

action, bearing production numbers Shatsky-JD00316 to Shatsky-JD00323, together with a certified translation of such records from Arabic into English.

533. Omar Sharif's Prisoner Payment Records reflect that Defendants made monthly payments to his beneficiary "Amer Saleh Muhammad Faiq A-Sharif," (Identification No. ^{“Redacted”} 2114") between May 2020 and May 2021 totaling 98,105 shekels. *See* Ex. 234 at Shatsky-JD00323.

534. ***Raed Al-Hutari.*** "Raed Al-Hutari" was convicted for his role in perpetrating the June 1, 2001 Attack that injured a U.S. national (*see ¶¶ 274-275, supra*). *See* Kaufman Decl. ¶ 8.

535. Attached as Exhibit 235 is a true and correct copy of Prisoner File documents as to "Raed Ahmad Mahmoud Houtari" ("Raed Houtari") that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD01438 to Shatsky-JD01440, Shatsky-JD01442, Shatsky-JD01444 to Shatsky-JD01445, and Shatsky-JD01450, together with a certified translation of documents bearing production numbers Shatsky-JD01444 to Shatsky-JD01445 from Arabic into English. Raed Houtari's Prisoner File reflects:

- a. The Commission's "Main Prisoner Form" stating that Raed Houtari was arrested on March 21, 2003 and received a "Life term" sentence. *See* Ex. 235 at Shatsky-JD01444.
- b. Certificates of The International Committee of the Red Cross, updated August 23, 2010, March 10, 2011, August 27, 2013, October 11, 2015, and August 15, 2018 certifying that "Raed Ahmad Mahmoud Houtari" was arrested on March 21, 2003 and received a life sentence. *See* Ex. 235 at Shatsky-JD01438-40, Shatsky-JD01442, Shatsky-JD01450.

c. That “Asma Abdel Rahim Abdullah Hutari” is listed as Raed Hutari’s “Authorized Representative (Beneficiary).” *See* Ex. 235 at Shatsky-JD01445.

536. Attached as Exhibit 236 is a true and correct copy of Prisoner Payment Records as to Raed Hutari that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00399 to Shatsky-JD00406, together with a certified translation of such records from Arabic into English.

537. Raed Hutari’s Prisoner Payment Records reflect that Defendants made monthly payments to his beneficiary “Asma Abd A-Rahim Hutari” between May 2020 and May 2021 totaling 105,777.66 shekels. *See* Ex. 236 at Shatsky-JD00406.

538. **Samer Atrash.** “Samer Atrash” pleaded guilty for his role in perpetrating the May 18, 2003 Attack that killed or injured nine U.S. citizens (*see ¶¶ 144-145, supra*). *See* Kaufman Decl. ¶ 7.

539. Attached as Exhibit 237 is a true and correct copy of Prisoner File documents as to “Samer Abd A-Sami Ahmad Al-Atrash” (“Atrash”) that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD01269, Shatsky-JD01271 to Shatsky-JD01274 and Shatsky-JD01277, together with a certified translation of documents bearing production numbers Shatsky-JD01273 to Shatsky-JD01274 from Arabic into English. Atrash’s Prisoner File reflects:

- a. The Commission’s “Main Prisoner Form” stating that Atrash was arrested on June 14, 2003 and received a “Life term” sentence. *See* Ex. 237 at Shatsky-JD01273.
- b. Certificates of The International Committee of the Red Cross, updated March 14, 2011, December 30, 2012, October 29, 2013, and December 14, 2015 certifying that “Samer Abdel Samia Ahmad Atrash” was arrested on June 14, 2003 and

received a life sentence. *See* Ex. 237 at Shatsky-JD01269, Shatsky-JD01271-72, Shatsky-JD01277.

c. That “Sana Abd Hmeidan Al-Atrash” is listed as Atrash’s “Authorized Representative (Beneficiary)” and wife. *See* Ex. 237 at Shatsky-JD01274.

540. Attached as Exhibit 238 is a true and correct copy of Prisoner Payment Records as to Atrash that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00308 to Shatsky-JD00315, together with a certified translation of such records from Arabic into English.

541. Atrash’s Prisoner Payment Records reflect that Defendants made monthly payments to his beneficiary “Sana Abd Hmeidan Al-Atrash” between May 2020 and May 2021 totaling 101,716.69 shekels. *See* Ex. 238 at Shatsky-JD00314-15.

542. ***Abdul Rahman Maqdad and Ahmed Sa’ad.*** “Ahmed Sa’ad” and “Abdul Rahman Maqdad” were convicted for their roles in perpetrating the January 29, 2004 Attack that injured eight U.S. citizens (*see* ¶ 118, *supra*). *See* Kaufman Decl. ¶ 8.

543. Attached as Exhibit 239 are true and correct copies of Prisoner Payment Records as to “Abdul Rahman Yousuf Abdul Rahman Miqdad” (“Miqdad”) that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00503 to Shatsky-JD00504, together with a certified translation of such records from Arabic into English.

544. Miqdad’s Prisoner Payment Records reflect that Defendants made monthly payments to his beneficiary “Abdul Rahman Yousuf Abdul Rahman M[cut off]” between May 2020 and May 2021 totaling 33,202.19 shekels. *See* Ex. 239 at Shatsky-JD00503-4.

545. Attached as Exhibit 240 are true and correct copies of Prisoner Payment Records as to “Ahmed Muhammad Ahmad Sa’ad” (“Sa’ad”) that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00507 to Shatsky-JD00513, together with a certified translation of such records from Arabic into English.

546. Sa’ad’s Prisoner Payment Records reflect that Defendants made monthly payments to his beneficiary “Muhammad Ahmad Mahmoud Sa’ad” between May 2020 and May 2021 totaling 89,200 shekels. *See* Ex. 240 at Shatsky-JD00512-13.

547. ***Ahmed Ali Mahmoud Abu-Khader.*** “Ahmed Ali Mahmoud Abu-Khader” (“Khader”) pleaded guilty for his role in perpetrating the January 17, 2002 Attack that killed or injured fifteen U.S. citizens (*see ¶¶ 101-102, supra*). *See* Kaufman Decl. ¶ 7.

548. Attached as Exhibit 241 are true and correct copies of Prisoner Payment Records as to Khader produced by Defendants in Arabic in this litigation with the Bates stamps Shatsky-JD00267 to Shatsky-JD00273, together with a certified translation of such records from Arabic into English.

549. Khader’s Prisoner Payment Records reflect that Defendants made monthly payments to his beneficiary “Muhammad Ali Mahmoud Abu-Khader” between May 2020 and May 2021 totaling 89,950 shekels. *See* Ex. 241 at Shatsky-JD00273.

550. ***Asem Umar Saleh al-Barghouti and Anees Ahmd Yosef Mashal.*** On the morning of December 13, 2018, Asem Ummar Saleh al-Barghuthi opened fire on a group of civilians and soldiers standing at a hitchhiking stop, killing two and leaving U.S. citizen Nathaniel Felber with a permanent, severe brain injury. *See Felber v. Islamic Republic of Iran*, No. 19-cv-1027 (D.D.C. Aug. 3, 2020) (D.E. No. 28); Proposed Findings of Fact ¶¶ 88, 108, 120, 132, 167, *Felber v. Islamic Republic of Iran*, No. 19-cv-1027 (D.D.C. Aug. 6, 2020), ECF

No. 30; Complaint, *Felber v. Islamic Republic of Iran*, No. 19-cv-1027 (D.D.C. Apr. 12, 2019), ECF No. 1.

551. “Asem Umar Saleh al-Barghouti” and “Anees Ahmd Yosef Mashal” pleaded guilty for their roles in perpetrating the attack. *See* Kaufman Decl. ¶ 7.

552. Attached as Exhibit 242 are true and correct copies of Prisoner Payment Records as to “Asem Umar Saleh Al-Barghouti” (“Saleh al-Barghouti”) that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00365 to Shatsky-JD00369, together with a certified translation of such records from Arabic into English.

553. Saleh al-Barghouti’s Prisoner Payment Records reflect that Defendants made monthly payments to his beneficiary “Suheir Isma’il Mussa Al-Barghouti” between May 2020 and May 2021 totaling 88,670.97 shekels. *See* Ex. 242 at Shatsky-JD00369.

554. Attached as Exhibit 243 are true and correct copies of Prisoner Payment Records as to “Ana Ahmad Yosef Mashal” (“Mashal”) that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00370 to Shatsky-JD00373, together with a certified translation of such records from Arabic into English.

555. Mashal’s Prisoner Payment Records reflect that Defendants made monthly payments to his beneficiary “Hanin Munir Saqr Al-Barghouti” between May 2020 and May 2021 totaling 80,990 shekels. *See* Ex. 243 at Shatsky-JD00373.

556. ***Fares Sadeq Mohamed Ghanem.*** “Fares Sadeq Mohamed Ghanem” was convicted for his role in perpetrating the January 22, 2002 Attack that injured seven U.S. citizens (*see* ¶ 280, *supra*). *See* Kaufman Decl. ¶ 8.

557. Attached as Exhibit 244 are true and correct copies of Prisoner Payment Records as to “Firas Sadeq Mohamed Ghanem” (“Firas Ghanem”) that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00407 to Shatsky-JD00414, together with a certified translation of such records from Arabic into English.

558. Firas Ghanem’s Prisoner Payment Records reflect that Defendants made monthly payments to his beneficiary “Nawal Hasan Ahmad Ghanem” between May 2020 and May 2021 totaling 101,040 shekels. *See* Ex. 244 at Shatsky-JD00413-14.

559. ***Karam Lutfi Fatahi Razek Al Masri.*** “Karam Lutfi Fatahi Razek Al Masri” pleaded guilty for his role in perpetrating the October 1, 2015 Attack in which a U.S. citizen was shot (*see* ¶ 354, *supra*). *See* Kaufman Decl. ¶ 7.

560. Attached as Exhibit 245 are true and correct copies of Prisoner Payment Records as to “Karam Lutfi Fathi Rizq” (“Karam Lutfi”) that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00361 to Shatsky-JD00362, together with a certified translation of such records from Arabic into English.

561. Karam Lutfi’s Prisoner Payment Records reflect that Defendants made monthly payments to his beneficiary “Lutfi Fathi Lutfi Rizq” between May 2020 and May 2021 totaling 38,327.42 shekels. *See* Ex. 245 at Shatsky-JD00362.

562. ***Muhammad Amoudi.*** “Muhammad Amoudi” pleaded guilty for his role in perpetrating the April 17, 2006 Attack that injured four U.S. citizens (*see* ¶¶ 290-291, *supra*). *See* Kaufman Decl. ¶ 7.

563. Attached as Exhibit 246 are true and correct copies of Prisoner Payment Records as to “Mohammed Khaled Hasan Amoudi” (“Amoudi”) that Defendants produced in connection

with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00355 to Shatsky-JD00360, together with a certified translation of such records from Arabic into English.

564. Amoudi's Prisoner Payment Records reflect that Defendants made monthly payments to his beneficiary "Samer Othman Sa'ud Al-Ghul" between May 2020 and May 2021 totaling 78,275 shekels. *See* Ex. 246 at Shatsky-JD00359-60.

565. ***Samach Samir Mohammed Shubaki.*** "Samach Samir Mohammed Shubaki" was convicted for his role in perpetrating the June 17, 2003 Attack that injured a U.S. citizen (*see ¶ 500, supra*). *See* Kaufman Decl. ¶ 8.

566. Attached as Exhibit 247 are true and correct copies of Prisoner Payment Records as to "Sameh Samir Mohammed Shubaki" ("Shubaki") that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-JD00487 to Shatsky-JD00493, together with a certified translation of such records from Arabic into English.

567. Shubaki's Prisoner Payment Records reflect that Defendants made monthly payments to his beneficiary "Muhammad Samir Muhammad Shubaki" between May 2020 and May 2021 totaling 89,200 shekels. *See* Ex. 247 at Shatsky-JD00493.

568. ***Wael al-Qassim.*** "Wael al-Qassim" was convicted for his role in perpetrating the July 31, 2002 Attack that injured twelve U.S. citizens (*see ¶ 395, supra*), and was paid by Defendants by reason of his imprisonment. *See* Plaintiffs' Trial Exhibits 41, 71, 152, and 1120, *Sokolow v. Palestine Liberation Org.*, No. 04-cv-0397 (GBD) (S.D.N.Y.), ECF Nos. 927-22, 927-34, 927-76, and 910-53.

569. Attached as Exhibit 248 are true and correct copies of Prisoner Payment Records as to "Wael Mahmoud Mohammed al-Qassim" ("Qassim") that Defendants produced in connection with jurisdictional discovery in this action, bearing production numbers Shatsky-

JD00458 to Shatsky-JD00465, together with a certified translation of such records from Arabic into English.

570. Qassim's Prisoner Payment Records reflect that Defendants made monthly payments to his beneficiary "Izdihar Mahmoud Muhammad Qassim" between May 2020 and May 2021 totaling 101,040 shekels. *See* Ex. 248 at Shatsky-JD00465.

Other Documents Relevant to the Disposition of Defendants' Motion

571. Attached as Exhibit 250 is a true and correct copy of a letter from Hon. Rami Hamdallah to Hon. Michael R. Pompeo, dated December 26, 2018 (U.S. Resp. to Feb. 6, 2019, Order, Ex. 1, *Klieman v. Palestinian Auth.*, No. 15-7034 (D.C. Cir. Feb. 15, 2019)), Doc. No. 1773566.

572. Attached as Exhibit 251 is a true and correct copy of the Memorandum of Law in Support of the Government's Intervention in Defense of the Promoting Security and Justice for Victims of Terrorism Act of 2019, *Fuld v. Palestine Liberation Org.*, No. 1:20-cv-03374-JMF (July 23, 2021), ECF No. 53.

573. Attached as Exhibit 252 is a true and correct copy of the Declaration of Yaniv Berman, dated October 1, 2021 certifying the translation of certain documents produced in this action and referred to in this Declaration and Plaintiffs' Opposition Brief.

574. Attached as Exhibit 256 is a true and correct copy of a stipulation between the parties to this action, dated August 3, 2021, that the entirety of the following video recordings are authentic for the purposes of Rule 901 of the Federal Rules of Evidence and satisfy the requirements of Rule 1002 of the Federal Rules of Evidence:

- a. A February 21, 2020 TRT Interview with Dr. Riyad Mansour, available at <https://www.youtube.com/watch?v=YiFm25C4N9U>. A certified, translated transcript of this interview is attached as Exhibit 257.
- b. An October 22, 2020 Interview of Dr. Riyad Mansour with the American-Arab Anti-Discrimination Committee, available at https://www.facebook.com/watch/live/?v=706628353543937&ref=watch_permalink. A certified transcript of this interview is attached as Exhibit 258.
- c. A November 14, 2020 appearance by Dr. Riyad Mansour at the Beit Sahour USA Virtual Convention, available at <http://www.youtube.com/watch?v=WTZtpXDIXTg&feature=youtu.be>. A certified, translated transcript of this appearance is attached as Exhibit 259.
- d. A November 19, 2020 Seton Hall University interview with Dr. Riyad Mansour, available at <https://www.youtube.com/watch?v=MjtMIurFfaY>. A certified transcript of this interview is attached as Exhibit 260.
- e. An April 6, 2021 Bridgewater State University interview with Dr. Riyad Mansour, available at https://www.youtube.com/watch?v=l4UIajoxO_c. A certified transcript of this interview is attached as Exhibit 261.
- f. A May 19, 2021 interview with Dr. Riyad Mansour on MSNBC's "Morning Joe" program, available at https://www.msnbc.com/morning-joe/watch/we-need-an-immediate-ceasefire-says-ambassador-112457285708?fbclid=IwAR20L8djkOkajL0GzdhvLYKyEbV-iiAS1656E08HQc261XQhneME_ecQIc. A certified transcript of this interview is attached as Exhibit 262.

g. A May 22, 2021 interview of Dr. Riyad Mansour by Al Jazeera, available at <https://www.youtube.com/watch?v=NtB1FETUqRw>. A certified, translated transcript of this appearance is attached as Exhibit 263.

575. Attached as Exhibit 264 is a true and correct copy of excerpts of the transcript of the deposition of Feda Abdelhady Nasser, conducted on July 22, 2021, and Exhibit 7 thereto.

576. Attached as Exhibit 265 is a true and correct copy of Exhibit 3 to the transcript of the deposition of Riyad Mansour, conducted on July 8, 2021, bearing production numbers Shatsky-JD00545 to Shatsky-JD00550.

577. Attached as Exhibit 266 is a true and correct copy of Exhibit 2 to the transcript of the deposition of Nadia Ghannam conducted on July 23, 2021.

578. Attached as Exhibit 267 is a true and correct copy of Exhibit 6 to the transcript of the deposition of Nadia Ghannam conducted on July 23, 2021.

579. Attached as Exhibit 268 is a true and correct copy of Exhibit 7 to the transcript of the deposition of Nadia Ghannam conducted on July 23, 2021.

580. Attached as Exhibit 269 is a true and correct copy of Exhibit 8 to the transcript of the deposition of Nadia Ghannam conducted on July 23, 2021.

581. Attached as Exhibit 270 is a true and correct copy of Exhibit 9 to the transcript of the deposition of Nadia Ghannam conducted on July 23, 2021.

582. Attached as Exhibit 271 is a true and correct copy of Exhibit 10 to the transcript of the deposition of Nadia Ghannam conducted on July 23, 2021.

583. Attached as Exhibit 272 is a true and correct copy of Exhibit 11 to the transcript of the deposition of Nadia Ghannam conducted on July 23, 2021.

584. Attached as Exhibit 273 is a true and correct copy of Exhibit 12 to the transcript of the deposition of Nadia Ghannam conducted on July 23, 2021.

585. Attached as Exhibit 274 is a true and correct copy of Exhibit 13 to the transcript of the deposition of Nadia Ghannam conducted on July 23, 2021.

586. Attached as Exhibit 275 is a true and correct copy of Exhibit 14 to the transcript of the deposition of Nadia Ghannam conducted on July 23, 2021.

587. Attached as Exhibit 276 is a true and correct copy of Exhibit 15 to the transcript of the deposition of Nadia Ghannam conducted on July 23, 2021.

588. Attached as Exhibit 277 is a true and correct copy of Exhibit 16 to the transcript of the deposition of Nadia Ghannam conducted on July 23, 2021.

589. Attached as Exhibit 278 is a true and correct copy of Exhibit 17 to the transcript of the deposition of Nadia Ghannam conducted on July 23, 2021.

590. Attached as Exhibit 279 is a true and correct copy of Exhibit 18 to the transcript of the deposition of Nadia Ghannam conducted on July 23, 2021.

591. Attached as Exhibit 280 is a true and correct copy of Exhibit 19 to the transcript of the deposition of Nadia Ghannam conducted on July 23, 2021.

592. Attached as Exhibit 281 is a true and correct copy of Exhibit 20 to the transcript of the deposition of Nadia Ghannam conducted on July 23, 2021.

593. Attached as Exhibit 282 is a true and correct copy of Exhibit 21 to the transcript of the deposition of Nadia Ghannam conducted on July 23, 2021.

594. Attached as Exhibit 283 is a true and correct copy of Exhibit 22 to the transcript of the deposition of Nadia Ghannam conducted on July 23, 2021.

595. Attached as Exhibit 284 is a true and correct copy of Exhibit 23 to the transcript of the deposition of Nadia Ghannam conducted on July 23, 2021.

596. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: October 4, 2021
New York, NY



Oliver S. Haker